

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:)
)
ROUGE STEEL COMPANY) DOCKET NO. V-W-86-R-61
3001 MILLER ROAD)
DEARBORN, MICHIGAN)
48121-1699)
_____)

COMPLAINANT'S PRE-HEARING EXCHANGE OF INFORMATION

COMES NOW the Complainant in this matter, and through its counsel, makes this Pre-hearing Exchange of Information in accordance with the Court's September 19, 1986 directive.

A. WITNESSES

1. The Complainant in this matter may call the following persons as witnesses in the event that a hearing is held herein.

a. Laura Lodisio -- U.S. Environmental Protection Agency, Region V, Chicago, Illinois.

Ms. Lodisio will testify as to the inspections conducted at the Rouge Steel facility, the regulatory scheme established under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6901 et seq., the proposed civil penalty, and other matters.

b. Rick Karl -- U.S. EPA, Region V, Chicago, Illinois.

Mr. Karl will testify as to the application of the U.S. EPA's civil penalty policy, enforcement procedures

in Region V, and other matters.

c. William Muno -- U.S. EPA, Region V, Chicago, Illinois.

Mr. Muno will testify as to the general application of the civil penalty policy, enforcement procedures in Region V, and other matters.

d. Margaret Field's -- Michigan Department of Natural Resources, Northville, Michigan.

Ms. Field's will testify as to observations made during inspections of the Rouge Steel facility, the regulatory scheme, and other matters.

e. Larry AuBuchon -- Michigan Department of Natural Resources, Northville, Michigan.

Mr. AuBuchon will testify as to observations made at the Rouge Steel facility, the application of the regulatory scheme, and other matters.

f. Expert Witness -- To be identified.

This expert will testify as to the operation of a steel mill such as the Rouge facility.

B. DOCUMENTS AND EXHIBITS

All documents and exhibits which the government presently intends to use in a hearing are attached. The government hereby specifically reserves its right to petition

this Court to add further documents or exhibits to the record in this case in the event that additional relevant documents or exhibits are developed between the present and any hearing in this matter.

C. VIEW ON HEARING LOCATION

The government suggests that the most convenient location for this hearing is Chicago, Illinois. At that location an appropriate hearing room can be procured, clerical support or conference telephones can be made available and most of the government witnesses are located there.

10/29/86
Date

R. Grimes
Roger Grimes
Counsel for Complainant

CERTIFICATE OF SERVICE

I certify that the foregoing Complainant's Pre-hearing Exchange of Information dated October 29, 1986 was served on the following parties in the manner described below:

By regular mail:

Peter J. Sherry
Office of the General
Counsel
Ford Motor Company
The American Road
Dearborn, Michigan 48121

Marvin E. Jones
Administrative Law Judge
Environmental Protection
Agency
Mail Code A-110
401 M. Street, S.W.
Washington, D.C. 20460

Original by hand delivery:

Regional Hearing Clerk
U.S. EPA -- Region V
230 South Dearborn St.
Chicago, Illinois 60604

10/29/86
Date

RMG
Roger Grimes
Counsel for Complainant

Rouge Steel - Index to Exhibits

#	DATE	DESCRIPTION
1	09-30-82	RCRA inspection report conducted by Susan Norton
2	10-19-82	Followup letter to Rouge/after ^{from MDNR} 09-30-82 inspection; "compliance at the facility is very high"; waste May qualify for exemption under 265.14(a) and (b); inspection report included.
3	10-22-82	Rouge Steel letter to MDNR; noting that corrections had been made following 09-30-82 inspection
4	11-12-82	MDNR letter to Rouge;
5.	09-21-83	MDNR inspection report; conducted by Susan Norton;
6	MDNR 10-19-83	MDNR letter to Rouge; "no violations" in the deepwell.
7	10-08-84	MDNR inspection report; conducted by Aubuchon and Field's; lots of inspector's notes.
8	10-15-84	MDNR letter to Rouge; noting several violations of RCRA; waste analysis plan, no examination of waste streams, spill plans confusing, training, no cleanup of spillage, no submission of cont. plan to outside authorities, no emergency coord. listed in plan, some manifest problems, "Haz. Waste" signs missing in some areas, waste pickle liquor not adequately contained;
9	11-15-84	Rouge letter to MDNR responding to violations; point by point discussion of 1-9 points from MDNR letter.
10	01-23-85	MDNR letter to Rouge; request for copy of closure plan.
11	03-29-85	USEPA letter/to Rouge; EPA's followup request for closure plan that had not been submitted to MDNR
12	04-22-85	USEPA letter of Warning to Rouge; Rouge not subject to 265 Subpt. G, and neednot send in closure plan.
13	05-21-86	MDNR letter to Rouge; describes a 05-07-85 reinspection of Rouge to follow the 10-08-84 insp.; itemized notes regarding items 1-9.
14	07-02-85	MDNR letter to Rouge withdrawing request for closure plan.
15	03-26-86	Rouge letter to MDNR; notes a 03-14-86 inspection by Field's; describes modification of operating procedures re; handling xxx decanter tar sludge.
16	03-14-86	RCRA inspection report xxx conducted by Field's and Lodisio;
17	04-15-86	MDNR letter to Rouge; followup to 03-14-86 inspection cites violations of evaluations of waste, signs, minimize possibility of release, training, treatment by solidification of tar sludge, manifesting.
18	05-15-86	Rouge letter to MDNR; addresses item by item the violations cited; includes attachments.
19	07-22-86	USEPA complaint.
20	na	USEPA penalty calculation sheets, plus Dunn and Bradstreet report. from 03-26-86.
21	MDNR 07-15-86	MDNR letter to Rouge; noting to Rouge that case had been sent to USEPA.

#	DATE	DESCRIPTION
22	08-13-86	USEPA letter to Rouge; noting the breakdown of penalty amounts for each violation.
23	09-03-86	USEPA letter and attachment to Rouge; enclosing "regulatory clarification" regarding "Totally Enclosed Treatment Facility"
24	08-20-86	THIS ITEM IS NOT TO BE THIS ITEM IS NOT TO BE AN EXHIBIT. Maggie Field's notes from the settlement conference.
25	08-20-86	THIS ITEM IS NOT TO BE AN EXHIBIT. Laura's notes from settlement conference.
26	08-22-86	Respondent's Answer.
27	10-09-86	Rouge letter to USEPA; plus attachments; THE LETTER CONTAINS SETTLEMENT DISCUSSIONS AND IS NOT TO BE AN EXHIBIT. However, the attachments to the letter are to constitute Complainant's Exhibit 27. They are two documents; sample results and a contingency plan.
28	11-17-80	Rouge's Part A permit application.
29	08-18-80	Rouge's Notification fo Haz Waste Activity and 03-24-82 letter to USEPA from Rouge noting change of name to Rouge Steel Company, wholly owned sub, of Ford Motor Company.
30	Undated	Rouges Generator Biennial Haz Waste Report for 1983

COMPLAINANT'S EXHIBIT 1

#1098

RCRA Inspection Report

EPA Identification Number: M I D 0 8 7 1 3 8 4 3 1Installation Name: ROUGE STEEL COMPANY (FORMERLY FORD MOTOR CO. ROUGE STEEL DIVISION)Location Address: 3001 MILLER ROADCity: DEARBORN State: MICHIGAN 148121Date of inspection: SEPT. 20, 1982 Time of inspection (from) 9:13 A.M. (to) 12:30 P.M.

Person(s) interviewed	Title	Telephone
<u>JOHN A. SCOTT</u>	<u>SUPERVISOR / ENVIRONMENTAL CONTROL</u>	<u>313-323-1260</u>
<u>GERALD DOROSNEWITZ</u>	<u>SUPERVISOR / "</u>	<u>313-323-1260</u>
<u>T.G. WEBER</u>	<u>ENVIRONMENTAL ENGINEER / "</u>	<u>313-323-1260</u>
<u>CHRIS PORTER</u>	<u>ENVIRONMENTAL CONTROL ENGINEER, STATIONARY SOURCE</u>	<u>313-322-1918</u>
<u>FRANK PILZNER - SUPERINTENDENT, ENVIRONMENTAL CONTROL OFFICE</u>	<u>BY-PRODUCTS-313-339-7745</u>	
Inspector(s)	Agency/Title	Telephone

SUSAN NORTON MICH. DEPT. OF NATURAL RESOURCES - WATER QUALITY 313-675-0860Installation Activity (mark only one box)Inspection Form(s)
☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
Generation and/or Transportation
A☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

RECEIVED

OCT 21 1982

PLEASE SEE THE NEXT PAGE FOR A DESCRIPTION OF THE WASTE. THE WASTE WAS LISTED AS D003, REACTIVE, BY THE COMPANY. BECAUSE THE CHEMICALS WHICH WOULD BE DEEMED REACTIVE COMPRISE LESS THAN 1/2 PERCENT OF A VOLUME THE REST OF WHICH IS WATER, IT SEEMS UNLIKELY THAT IT ACTUALLY SHOULD BE LISTED AS D003. FURTHER, THE WASTE IS DISPOSED OF BY DEEP-WELL INJECTION, PERMITTED UNDER A STATE U.I.C. PROGRAM AND AN NPDES PERMIT

ORIGINAL TO
MR. ESPEY:
 CC MR. PILZNER
 JERRY AMBER
 JERRY DOROSNEWITZ
 MR. WEBER - FOR DEEPWELL
 MR. ROBT. IVES

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	<i>SURGE TANK</i>	I
S02	<input type="checkbox"/>	storage in tanks		J
T01	<input type="checkbox"/>	treatment in tanks		J
S04	<input type="checkbox"/>	storage in surface impoundment		K,F
T02	<input type="checkbox"/>	treatment in surface impoundment		K,F
D83	<input type="checkbox"/>	disposal in surface impoundment		K,F
S03	<input type="checkbox"/>	storage in waste pile		L
D81	<input type="checkbox"/>	disposal by land application		M,F
D80	<input type="checkbox"/>	disposal in landfill		N,F
T03	<input type="checkbox"/>	treatment by incineration		O/P
T04	<input checked="" type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators		Q

Other activities *FILTRATION OF DDO3 FLUIDS PRIOR TO DEEPWELL INJECTION*
☒ *D99* - DEEPWELL INJECTION IS DISPOSAL AT THIS PLANT

GENERATOR ☒ APPENDIX GN

TRANSPORTER ☐ APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

ROUGH STEEL DIVISION OPERATES 2 UNDERGROUND INJECTION WELLS. ONLY ONE IS IN PREDOMINATE USE - THE OTHER IS A STANDBY. THEY ARE NEVER RUN SIMULTANEOUSLY - CANNOT BE RUN AT THE SAME TIME. THE "HAZARDOUS MATERIAL" IS DDO3 - FINAL COOLING WATER FROM COOLING THE COKE OVEN BY-PRODUCT GAS. CONTAINS PHENOLS, AMMONIA, CYANIDE, AND SOME OTHERS. (4-82A)

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	N/A
b. Facility expansion?	—	—	—	N/A
c. Change of owner or operator?	X	—	—	CHANGED TO WHOLLY-OWNED SUBSIDIARY OF FORD MOTOR CO.
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	—	—	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	N/A
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	X	—	—	
or				
b. i. Artificial or natural barrier around facility?	X	—	—	
and				
ii. Controlled entry?	X	—	—	
c. Danger sign(s) at entrance?	—	X	—	THERE ARE DANGER SIGNS AT THE ENTRANCE TO THE COKE BY-PRODUCTS AREA
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	X	—	—	

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>	—	—	—
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<u>X</u>	—	—	—
ii. safety and emergency equipment?	<u>X</u>	—	—	—
iii. security devices?	<u>X</u>	—	—	—
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<u>X</u>	—	—	—
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>	—	—	—
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>	—	—	HOURLY
d. Are areas subject to spills inspected daily when in use?	<u>X</u>	—	—	—
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>	—	—	—
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>	—	—	—
ii. the name of the inspector?	<u>X</u>	—	—	—
iii. a notation of the observations made?	<u>X</u>	—	—	—
iv. the date and nature of any repairs or remedial actions?	<u>X</u>	—	—	—
5. Do personnel training records include: 265.16				
a. Job titles?	<u>X</u>	—	—	—
b. Job descriptions?	<u>X</u>	—	—	—

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	___	___	_____
d. Records of training?	<u>X</u>	___	___	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	___	___	_____
f. Do new personnel receive required training within six months?	___	___	___	<u>N/A - NO NEW HIRES</u>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u>X</u>	___	___	_____
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	___	___	___	<u>N/A</u>
b. No smoking signs?	___	___	___	<u>N/A</u>
c. Separation and protection from ignition sources?	___	___	___	<u>N/A</u>

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— X —

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or
alarm systems?

X — —

b. Telephone or 2-way radios
at the scene of operations?

X — —

TELEPHONE

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

X — —

THERE IS NO HAZARD FROM FIRE
OR EXPLOSION ~~AT~~ FROM THE
WASTE IN QUESTION.

Indicate the volume of water and/or foam available for fire control:

3. Testing and Maintenance of Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

X — —

b. Is emergency equipment
maintained in operable
condition?

X — —

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

X — —

5. Is there adequate aisle space for unobstructed movement?

X — —

N/A — EVERYTHING IS OUT IN AN
OPEN FIELD

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

— — X

ROUTE MEDICAL FACILITY IS ON
SITE AND OPERATES 24 HOURS/DAY.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<u>X</u>	___	___	_____
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<u>X</u>	___	___	_____
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u>X</u>	___	___	ONLY ONE E.C. - HE HAS ENVIRONMENTAL CONTROL ENGINEER ON CALL 24 HRS / DAY AT PLANT.
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<u>X</u>	___	___	_____
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	___	___	___	N/A.
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<u>X</u>	___	___	_____

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X — — —

X — — —

X — — —

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

— — — N/A

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	<u>N/A</u>
b. Are records of past shipments retained for 3 years?	—	—	—	<u>N/A</u>
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	—	—	<u>N/A</u>
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<u>X</u>	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u>X</u>	—	—	<u>THE AMOUNT OF FLUID PUMPED INTO THE DEEPWELL IS METERED & RECORDED DAILY.</u>
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	<u>NOT APPLICABLE</u>
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	N/A
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X	—	—	
v. Reports detailing all incidents that required implementation of the Contingency Plan?	—	—	—	N/A
vi. All closure and post closure costs as applicable?	—	—	—	N/A
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	X	—	—	
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?	—	—	—	N/A
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

MID 087138431

Section G - CLOSURE AND POST CLOSURE (Part 25 Subpart G)

<i>EXEMPT UNDER SUBPART R</i>		YES	NO	NI	Remarks
1.	Closure 265.112				
a.	Is the facility closure plan available for inspection?	_____	_____	_____	_____
b.	Does the plan identify:				
i.	maximum extent unclosed during facility life?	_____	_____	_____	_____
ii.	maximum hazardous waste inventory?	_____	_____	_____	_____
iv.	estimated year of closure?	_____	_____	_____	_____
v.	schedule of closure activities?	_____	_____	_____	_____
c.	Has closure begun?	_____	_____	_____	_____
*2.	Post-Closure 265.118				
a.	Is the post-closure plan available for inspection?	_____	_____	_____	_____
b.	Does this plan contain:				
i.	description of groundwater monitoring activities and frequencies?	_____	_____	_____	_____
ii.	description of maintenance activities and frequencies for				
AA.	integrity of cap, final cover, or containment structures, where applicable	_____	_____	_____	_____
BB.	facility monitoring equipment	_____	_____	_____	_____
iii.	name, address, and phone number of person or office to contact during post-closure care period?	_____	_____	_____	_____
c.	Has the post-closure period begun?	_____	_____	_____	_____
d.	Is the written post-closure cost estimate available? 265.144	_____	_____	_____	_____

*Applies only to disposal facilities.

Section A: Scope

NOT APPLICABLE - NO OFF-SITE DISPOSAL

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	_____	_____	_____	_____
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. _____	_____	_____	_____	_____
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	_____	_____	_____	_____
b. Name, mailing address, telephone number, and EPA ID number of Generator	_____	_____	_____	_____
c. Name and EPA ID Number of Transporter(s)?	_____	_____	_____	_____
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	_____	_____	_____	_____
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	_____	_____	_____
f. The total quantity of waste(s) and the type and number of containers loaded?	_____	_____	_____	_____
g. Required certification?	_____	_____	_____	_____
h. Required signatures?	_____	_____	_____	_____
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. _____				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

COMPLAINANT'S EXHIBIT 2

STATE OF MICHIGAN



WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

JACOB A. MOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

#1098

October 19, 1982

CERTIFIED MAIL

Mr. Jerome A. Esper
Environmental Control
Rouge Steel Company
3001 Miller Road
Room 2112, Rouge Office Bldg.
Dearborn, Michigan 48121

RECEIVED

OCT 21 1982

ACT 6d

Re: MID087138431
Rouge Steel Co. Deepwell
Injection Site

Dear Mr. Esper:

On September 20, 1982, Susan Norton of this office visited the Rouge Steel Company deepwell injection facility. The purpose of the visit was to determine compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. The inspection was conducted with Mr. Gerald Doroshewitz, Mr. T. G. Weber and Mr. C. H. Porter of SSECO. We are pleased to note that over all, compliance at the facility is very high. Only one discrepancy was noted.

Signs reading "Danger-Unauthorized Personnel Keep Out" were not posted on the deepwell sheds. This is in violation of 40 CFR 265.14(c). We request that you respond by letter no later than November 19, 1982, indicating what actions have been taken to correct this deficiency.

We would like to point out, however, that based on the nature of the waste, it may possibly qualify for the exemption cited in 40 CFR 265.14(a) and (b). Should you wish to seek exemption, we respectfully request that we be kept informed of your status by copy of any correspondence you may have with EPA Region V.

A copy of the RCRA inspection report is enclosed for your inspection. Should you have any questions, please do not hesitate to contact this office at (313) 675-0860.



Mr. Jerome A. Esper
October 19, 1982
Page 2

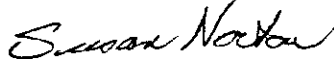
Our appreciation is extended to your staff and Mr. Porter for their assistance.

Yours truly,

WATER QUALITY DIVISION



Roy E. Schrameck, P.E.
District Engineer



By: Susan Norton
Water Quality Specialist

RES:SN/sc

Enclosure

cc: Alan Howard, OHWM (2)
J. Amber
G. Doroshewitz
R. Ives, DNR Geological Survey
F. Pilzner
T. Weber

COMPLAINANT'S EXHIBIT 3



3001 Miller Road
P. O. Box 1699
Dearborn, Michigan 48121-1699

October 22, 1982

RECEIVED

OCT 26 1982

WATER QUALITY DIV.
DIST. I

Mr. Roy E. Schrameck, P.E.
District Engineer
Department of Natural Resources
9311 Groh Road
Grosse Ile, Michigan, 48138

Subject: Your Violation Notice Dated October 19, 1982 Regarding
MID 087138431 Rouge Steel Company Deepwell Injection Site

Dear Mr. Schrameck:

In your subject letter it was pointed out that signs reading "Danger - Unauthorized Personnel Keep Out" were not posted on our deepwell sheds in violation of 40 CFR 265.14(c).

This will inform you that these signs were posted on these sheds on October 8, 1982 in response to Ms. Norton's request.

If you require any further information, please advise.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'J. A. Esper', written over a horizontal line.

J. A. Esper
Plant & Equipment Engineering Manager

HC (2) ALON HOWARD

COMPLAINANT'S EXHIBIT 4

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

November 12, 1982

Mr. J. A. Esper
Plant and Equipment Engineering Manager
Rouge Steel Company
3001 Miller Road
P. O. Box 1699
Dearborn, Michigan 48121

Re: MID087138431

Dear Mr. Esper:

Thank you for your letter of October 22, 1982. You indicate that the deep well facility is now in compliance with the provision of Subtitle C of RCRA noted as a deficiency during our inspection of September 20, 1982.

Thank you for your cooperation in this matter. If you have questions concerning hazardous waste management feel free to contact us at (313) 675-0860.

Yours truly,

WATER QUALITY DIVISION

Roy E. Schrameck

Roy E. Schrameck, P.E.
District Engineer

Susan Norton

By: Susan Norton
Water Quality Specialist

RES:SN/sc

cc: Alan Howard, OHWM (2)
J. Amber



EPA

#1098

YES
12/8/82

RECEIVED
NOV 16 1982

COMPLAINANT'S EXHIBIT

5

RCRA Inspection Report

EPA Identification Number: M 1 D 0 8 7 1 3 8 4 3 1

Installation Name: ROUGE STEEL COMPANY

Location Address: 3001 MILLER ROAD (P.O. BOX 1699)

City: DEARBORN State: MICHIGAN 148121-1699

Date of inspection: SEPT 21, 1983 Time of inspection (from) 2:20 P.M. (to) 3:47 P.M.

Person(s) interviewed	Title	Telephone
<u>MR. THOMAS G. WEBER</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(313) 323-1260</u>

Inspector(s)	Agency/Title	Telephone
<u>SUSAN NORTON</u>	<u>MICH. DEPT. NAT. RES. / HAZ. WASTE DIV.</u>	<u>(313) 675-0860</u>

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input checked="" type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

FILTRATION OF DOOS FLUIDS PRIOR TO DEEPWELL INJECTION

Other activities

D79 - DEEPWELL INJECTION IS SOLE DISPOSAL MODE AT THIS PLANT

GENERATOR ☒ — *COMPANY GENERATES WASTE, BUT THIS SECTION NOT APPLICABLE BECAUSE WASTE NOT SHIPPED OFFSITE FOR DISPOSAL*

APPENDIX ☒ GN

TRANSPORTER ☐

APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
b. Facility expansion?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
c. Change of owner or operator?	<u> </u>	<u> </u>	<u> </u>	<u>N/A NO CHANGE SINCE LAST INSPECTION</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
and				
ii. Controlled entry?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c. Danger sign(s) at entrance?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>	___	___	___
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<u>X</u>	___	___	___
ii. safety and emergency equipment?	<u>X</u>	___	___	___
iii. security devices?	<u>X</u>	___	___	___
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<u>X</u>	___	___	___
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>	___	___	___
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>	___	___	<u>hourly</u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>	___	___	___
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>	___	___	___
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>	___	___	___
ii. the name of the inspector?	<u>X</u>	___	___	___
iii. a notation of the observations made?	<u>X</u>	___	___	___
iv. the date and nature of any repairs or remedial actions?	<u>X</u>	___	___	___
5. Do personnel training records include: 265.16				
a. Job titles?	<u>X</u>	___	___	___
b. Job descriptions?	<u>X</u>	___	___	___

	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	—
d. Records of training?	<u>X</u>	—	—	—
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	—
f. Do new personnel receive required training within six months?	—	—	—	<u>N/A - NO NEW HIRES</u>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u>X</u>	—	—	—
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	—	—	—	<u>N/A</u>
b. No smoking signs?	—	—	—	<u>N/A</u>
c. Separation and protection from ignition sources?	—	—	—	<u>N/A</u>

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)1. Maintenance and Operation
of Facility: 265.31Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— X —2. If required, does the facility
have the following equipment: 265.32a. Internal communications or
alarm systems?X — —N/Ab. Telephone or 2-way radios
at the scene of operations?X — —TELEPHONEc. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?X — —

Indicate the volume of water and/or foam available for fire control:

SOURCE OF WATER FOR FIRE CONTROL IS ROUGE RIVER.3. Testing and Maintenance of
Emergency Equipment: 265.33a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?X — —b. Is emergency equipment
maintained in operable
condition?X — —4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34X — —5. Is there adequate aisle space
for unobstructed movement?X — —(SHEDS FOR WELL HEADS)
N/A - EVERYTHING OUT IN AN OPEN
FIELD6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?— — XROUGE MEDICAL FACILITY IS ON SITE,
OPEN 24 HRS/DAY, & HAS AN AMBULANCE
SERVICE.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — — —

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X — — —

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— — — N/A

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X — — —

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
b. Are records of past shipments retained for 3 years?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
***iii. A map or diagram of each cell or disposal area				

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	_____	_____	_____	<u>N/A</u>
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<u>X</u>	_____	_____	_____
v. Reports detailing all incidents that required implementation of the Contingency Plan?	_____	_____	_____	<u>NOT APPLICABLE</u>
vi. All closure and post closure costs as applicable?	_____	_____	_____	<u>NOT APPLICABLE</u>
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	<u>X</u>	_____	_____	_____
5. **Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?	_____	_____	_____	<u>NOT APPLICABLE</u>
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.	_____	_____	_____	<u>NOT APPLICABLE</u>

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

EXEMPT UNDER
SUBPART R

YES NO NI Remarks

1. Closure 265.112

- a. Is the facility closure plan available for inspection?
- b. Does the plan identify:
 - i. maximum extent unclosed during facility life?
 - ii. maximum hazardous waste inventory?
 - iv. estimated year of closure?
 - v. schedule of closure activities?
- c. Has closure begun?

*2. Post-Closure 265.118

- a. Is the post-closure plan available for inspection?
- b. Does this plan contain:
 - i. description of groundwater monitoring activities and frequencies?
 - ii. description of maintenance activities and frequencies for
 - AA. integrity of cap, final cover, or containment structures, where applicable
 - BB. facility monitoring equipment
 - iii. name, address, and phone number of person or office to contact during post-closure care period?
- c. Has the post-closure period begun?
- d. Is the written post-closure cost estimate available? 265.144

*Applies only to disposal facilities.

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	FILTERING OF WASTE PRIOR TO INJECTION			YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	<input checked="" type="checkbox"/>						
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	<input checked="" type="checkbox"/>						
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	NOT APPLICABLE						
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>						
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	<input checked="" type="checkbox"/>						
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406		<input checked="" type="checkbox"/>					

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

COMPLAINANT'S EXHIBIT 6

12-8-83
Code 0

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028

LANSING, MI 48909

~~HOWARD P. MASON BUILDING~~

Ronald Skoog, Director
Hazardous Waste Division
9311 Groh Road
Grosse Ile, Michigan 48138

October 19, 1983

CERTIFIED MAIL

Mr. Thomas G. Weber
Environmental Engineer
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121-1699

Re: MID 087⁷138431

Dear Mr. Weber:

On September 21, 1983, I inspected the Rouge Steel deepwell injection facility to determine compliance with the provisions of Subtitle C of the Resource Conservation and Recovery Act of 1976 (RCRA), as amended. I am pleased to report that no violations were observed during the inspection. I would like to commend you and your staff for maintaining this high level of compliance.

A copy of the RCRA inspection report is enclosed for your examination. Please feel free to call me at (313) 675- 0860 if you have any questions about the inspection or the report. Thank you for the cooperation and assistance you extended during the inspection.

Sincerely,

Susan Norton

Susan Norton
Water Quality Specialist
Compliance Section
Hazardous Waste Division

SN
Enclosure
cc: Hazardous Waste Division (3)

COMPLAINANT'S EXHIBIT 7

RCRA Inspection Report

EPA Identification Number: MTD 087738431
 Installation Name: ROUGE STEEL CO (FORMERLY FMC ROUGE STEEL DIV)
 Location Address: 3001 MILLER RD
 City: DEARBORN State: MI 48121

Date of inspection: 10/8/84 Time of inspection (from) 11 AM (to) 4 PM
10/10/84 10 AM 4 PM

Person(s) interviewed	Title	Telephone
<u>GERALD DOROSHEWITZ (10/8+10)</u>	<u>SUPR/ENVIR. CONTROL</u>	<u>(313) 323-1260</u>
<u>C. H. PORTER (10/10)</u> <u>(CHRIS)</u>	<u>SSECO</u>	<u>(313) 322-1918</u>

Inspector(s)	Agency/Title	Telephone
<u>LARRY AUDUCHON (10/10)</u>	<u>MDNR-HWD/WQS</u>	<u>(313) 459-9180</u>
<u>MARGARET FIELD'S (10/8+10)</u>	<u>" "</u>	<u>" "</u>

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or
 Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	<i>< 90 DAYS - POWERHOUSE + POB STORAGE AREA</i>	I
S02	<input type="checkbox"/>	storage in tanks		J
T01	<input type="checkbox"/>	treatment in tanks		J
S04	<input type="checkbox"/>	storage in surface impoundment		K,F
T02	<input type="checkbox"/>	treatment in surface impoundment		K,F
D83	<input type="checkbox"/>	disposal in surface impoundment		K,F
S03	<input type="checkbox"/>	storage in waste pile		L
D81	<input type="checkbox"/>	disposal by land application		M,F
D80	<input type="checkbox"/>	disposal in landfill		N,F
T03	<input type="checkbox"/>	treatment by incineration		O/P
T04	<input checked="" type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators		<u>Q</u>

Other activities

GENERATOR ☒

TRANSPORTER ☐

APPENDIX GN

APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NONE

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

— — NA { Disposes of only one waste stream Final Cooling H₂O generated on site

b. Facility expansion?

X — —

c. Change of owner or operator?

— — NA → Proposed W/C for waste No Change pickle liquor

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X — — Analysis done in 1980 but no change expected as Co claims process same

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X — — Plan calls for at least annual sampling. Not complied with in practice

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

— — NA None from off site

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

X — — { Maintained at the outer edge of the large complex. No security at the well site as was indicated in previous report

b. i. Artificial or natural barrier around facility?
and

X — —

ii. Controlled entry?

X — —

c. Danger sign(s) at entrance?

X — — On the well sheds

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

X X — The company takes readings 3x/ly and claims the wells are inspected for these areas. However - cont - over

*Not Inspected

#4(2) Cont

The piping from the surge tank to the well was not tested for integrity. The company had not identified what constituted abnormal conditions with the well head except leaks and vague undefined variances in pressure readings. During the inspection the pressure gauge at the surge tank ~~was~~ had 100 psi gradients and read = 300 psi. It was capable of registering over 2500 psi. The well head registered 450 psi. The annulus, once pressured to 15, was reading 8 psi. This indicated no leak to the annulus but the inspector wondered whether the annulus leaked.

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	X			The plan only discussed the UIC. Nothing else is addressed. Other records were eventually located which covered many areas.
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				X None identified
ii. safety and emergency equipment?				X None identified
iii. security devices?				X But was the company's security force's respon.
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	X			In records referred to in b.
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?		X		
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?		X		
d. Are areas subject to spills inspected daily when in use?	X			People are in the areas however there had been spills in the tar pit area and allowed to stand - No Clean up.
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	X			In other areas under other programs - not complete & difficult to locate.
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?		X		No times kept
ii. the name of the inspector?	X			
iii. a notation of the observations made?	X			Chd Satish & Mrs.
iv. the date and nature of any repairs or remedial actions?				None observed

5. Do personnel training records include: 265.16

a. Job titles?

b. Job descriptions?

See B-3 Note
 Yes for the UIC operations
 No for the Coke & Eten Furnace
 Dist Tanks and Pickle liquor operations. In addition, the facility had B-2 not determined who needed training let alone confirm they had obtained it. 4/82-A

TRAINING *

	YES	NO	NI	Remarks
c. Description of training?	X	—	—	—
d. Records of training?	X	—	—	—
e. Did facility personnel receive the required training by 5-19-81?	X	—	—	Company stated so
f. Do new personnel receive required training within six months?	—	—	—	unknown
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	—	—	—	see note on 5(a) & (b)
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	—	—	—	unknown if necessary
b. No smoking signs?	—	—	NA	see below
c. Separation and protection from ignition sources?	—	—	NA	—

* There was no record observed that indicated the emergency coordinators had any training. Except for knowing why the waste streams were classified hazardous no one seemed to know whether the materials required special handling or exposure precautions, i.e. no one knew whether the final cooling waters (CN + Phenol content) would release hazardous gases if acidized ~~yet it was not~~ whether a spill into the B-3 sanitary sewer should be diverted or cause for alarm even though 4/82-A the material is classified reactive. No special handling may be necessary but it was not known.

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI

Remarks

*Naphthalene crystals
in air at tar pit. (OIER)
Tar Spills in loading area near
tar pit.*

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

X — —

Telephones

b. Telephone or 2-way radios
at the scene of operations?

X — —

*Areas near offices
where telephones are
located.*

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

*unknown - the facility has
not determined what incidents could
occur or what response equipment would
be needed.*

Indicate the volume of water and/or foam available for fire control:

*Has access to city and river water supplies. Coke area
uses river water supplied by powerhouse. These were controlled
by one dept responsible for entire complex.*

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

— *X* —

*the equipment necessary
was not identified and
therefore these areas*

b. Is emergency equipment
maintained in operable
condition?

— *X* —

*could not be determined.
Fire equipment was
controlled by on site dept.*

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

— — *NA*

Not Needed

5. Is there adequate aisle space
for unobstructed movement?

— — *NA*

Areas mostly outdoors

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

X — —

*But not documented.
Verbally stated copies
were given to Dearborn
City Police and Fire Dept.*

C-1

*Rough Steel has some on site
24 hr Medical service.*

The following are health and incident concerns but are not regulated by RCRA.

* Naphthalene is of concern because it is considered toxic by inhalation with a tolerance of 10 ppm. in air. It was being added to the tar pit from a distillation process. As it cooled it crystallized and fell through the air. In addition to inhalation of crystals, the material sublimates at room temperature. (Flash 176°F)

Other inhalation concerns were also present. Coal tar pitch "is composed almost entirely of polynuclear aromatic compounds... Volatile components (anthracene, phenanthrene, acridine) are carcinogenic agents.

Tolerance, 0.2 mg per m³ in air. "No respiratory protection was used and the facility representatives did not seem knowledgeable and even ~~minimized~~ ^{discounted} any problems by referring to the area as like moth balls.

* Condensed Chemical Dictionary 10th Edition.

Another concern regards the gas line drip water. This, like the cooling water contains cyanides. It is collected then used for quenching. The facility might evaluate whether the steel quenching water could come in contact with pickling liquor and release toxic gases.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

Note: The facility had at least three different response plans on paper. One only addressed Air & Water emissions with no reference to Haz Waste streams. Another did not include any immed notification of emerg coord agencies. None gave practical information.

— X — See training notes.

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

— X —

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

— X —

The plan did list the general office number and number to access the keeper.

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— X —

Again - never identified

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— — NR

Facility did not feel wastes required this response but air/water unknown.

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X — —

Co stated yes but not documented.

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>			<u>No names listed but office was</u>
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>			<u>An on site emergency coordinator was not familiar with proper response.</u>
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			<u>NA</u>	<u>No incidents since '81.</u>

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES NO NI Remarks

**** 1. Use of Manifest System 265.71**

a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

NA - No Disposal
of off site wastes. See
GN-1 for generator
manifest info.

b. Are records of past shipments retained for 3 years?

**** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72**

**** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.**

3. Operating Record 265.73

a. Does the owner or operator maintain an operating record as required in 265.73?

X As relates

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

X The amount of fluid
pumped into the piping
(assumed to be same at
well) is metered and
recorded daily.

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

NA

*****iii. A map or diagram of each cell or disposal area**

***** only applies to disposal facilities**

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See Below
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	at pump = 100' from wells
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The area is manned 24 hrs so these are assumed but not documented.
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As noted before - No spec requirements were identified nor those expected eliminated - unknown
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

The facility generates a large quantity of final cooling water. This is process water which is passed through a surge tank. This tank is used to then pipe the water through cooling piping or through micron filters (50, 10, 5, 1 etc) prior to deep well injection. This form applies to the filters.

Appendix GN

Section A: Scope

- Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>3 areas + Gas Drip</u> <u>Coke - Tar (K087)</u> <u>BOF - Furnace Dust (K06)</u>
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>Hi Line - K062</u> <u>Waste Pick Up</u> <u>Coke = 80</u> <u>BOF = 200</u> <u>ckd = 180</u> <u>Hi Line = 600</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Gas Drip material</u> <u>used D003 & P030</u>
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				<u>3 from the Coke office</u> <u>Undetermined in Hi Line</u> <u>None in BOF (DETAILS OVER)</u>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				<u>NONE</u>

	<u>Manifests</u> #	<u>DATE</u>	<u>WASTE</u>
Coke Area {	#0275206	1/4/84	K087
	#0275209	1/18/84	K087
	#0275268	8/30/84	P030(D003) DRIPOLIS

The Hi Line manifests were not organized so that shipments and disposals were reconciled. It therefore could not be determined whether any were properly disposed of. The facility was also keeping the department's white copies that should have been submitted.

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

- | | YES | NO | NI | Remarks |
|---|-----|----|----|---|
| 1. Is waste packaged in accordance with DOT regulations?
(Required prior to movement of hazardous waste off-site) 262.30 | — | — | NA | No Containers observed
Other mat'l trucked |
| 2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site) 262.31 262.32 | — | — | NA | |
| 3. If required, are placards available to transporters of hazardous waste? 262.33 | — | — | NA | |
| 4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision | | | | |
| a. Is each container clearly marked with the start of accumulation date? | — | — | NA | <div style="display: flex; align-items: center;"> <div style="font-size: 3em; margin-right: 10px;">}</div> <div> <p>No containers observed</p> <p>Determined by comparing capacity to manifest ship.</p> <p>The tar, pickle liquor, furnace dust & drip water/oil were stored in tanks which were marked.</p> </div> </div> |
| b. Have more than 90 days elapsed since the date inspected in (a)? | — | — | NA | |
| c. Do wastes remain in accumulation tanks for more than 90 days? | — | X | OK | |
| d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? | — | X | | |

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

- | | YES | NO | NI | Remarks |
|--|-----|----|----|---------|
| 1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40 | — | — | X | |

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

- | | | | | |
|--|---|---|----|--|
| 1. Has the installation imported or exported Hazardous Waste? 262.50 | — | — | NA | |
| (If answered Yes, complete the following as applicable.) | | | | |
| a. Exporting Hazardous waste; has a generator: | | | | |

YES NO *NA* Remarks


i. Notified the Administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing Hazardous Waste; has the generator met the manifest requirements?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____



COMPLAINANT'S EXHIBIT 8

EPA

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
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O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director
15500 Sheldon Road
Northville, Michigan 48167

October 15, 1984

CERTIFIED MAIL

Mr. Gerald Doroshewitz
Supervisor - Environmental Control
ROUGE STEEL COMPANY
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121-1699

RE: MID087738431

Dear Mr. Doroshewitz:

On October 8, and 10, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility at the above address to evaluate compliance with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. On October 8th, the participants were the two of us. On October 10th, Larry AuBuchon, another RCRA inspector, and C.H. Porter of Ford's SSEC Office also participated.

As a result of the investigation, it has been determined that the facility is in violation of the requirements of Subtitle C of RCRA. The specifics are listed below with reference to the inspection report format, i.e. B2a would be Section B, question 2a of the report.

1. B2a. The facility was not in compliance with the facility waste analysis plan which stated that analysis of the waste streams will be performed at least annually. The last analysis of the Final Cooling water was performed in 1980. 40CFR 265.13(a)(4)(b) requires that a waste analysis plan must be developed and followed. The facility representative stated that the waste stream processes have remained unchanged. If so, the facility could be brought into compliance by rewriting the plan to require additional analysis only when the generating processes or materials are altered. Of course, if this approach is taken, it will be necessary for the facility to be fully aware of processes, materials and any changes made with these.
2. B4, C, & D. The facility had not examined the waste streams to determine what, if any, special handling or exposure precautions were necessary. The potential or possible spill incidents had not been determined either. Therefore, it was not possible to identify 1) what safety or emergency equipment would be necessary; 2) what could be identified as monitoring equipment; 3) what type of equipment problems, spills, etc. could be

(continued)

10-15-84

2. (continued)
expected; 4) what should be included in an inspection schedule; 5) what emergency services or agreements could be necessary, etc. The facility had at least three different spill type plans which were confusing, incomplete and even contradictory. One of these did apparently require monthly inspections of various storage and operating areas. However, these lacked details such as emergency and monitoring equipment, types of problems to be looked for, time, etc. These factors addressed above are required by 40CFR 265 Subparts B, C, and D.
3. B5. The facility must be able to respond to #2 above before the plan can adequately identify those employees that need training and what type of training is needed. The plan did address most items for the Final Cooling Water (UIC) but did not for the tar pitch, electric furnace dust, drip tanks or pickle liquor operations. Some training was provided but there was: 1) no system to identify or provide new employees with training within six months; 2) no identification by name or job what employees needed training to ensure all received it; 3) no indication of annual review, and 4) no evidence of any training of the emergency coordinators.
4. C1. The facility had not cleaned up tar spillage in the tar pitch loading area as required by the facility contingency plan. There was also visible evidence of naphthalene crystal release to the air. 40CFR 265.31 requires that "Facilities must be maintained and operated to minimize the possibility of... any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents...".
5. C6, D1b. There was no documentation that copies of the contingency plan had been submitted to outside agencies as required by 40CFR 265.53. However, the facility representative verbally stated that copies had been given to the Dearborn City Police and Fire Departments. The on site medical service was reportedly the only medical assistance necessary. This should be re-evaluated as it is suspected that such a service unit would not be capable of handling a large number of people if a major incident occurred.
6. D1c. The plan did not list any emergency coordinator by name. This is required by 40CFR 265.52(d).
7. Appendix GN-B. The facility's coke area manifests included at least two shipments for which they had not received a signed copy from the TSD and had not filed exception reports as required by 40CFR 262.42. The electric furnace dust manifest records were excellent. The Hi-Line waste pickle liquor and gas line drip manifests were unorganized and it could not be determined whether these were in compliance.
8. Appendix GN-C. The tar pitch, pickle liquor, furnace dust, and gas line drip storage tanks were not marked "Hazardous Waste" as required by 40CFR 262.34.

(continued)

10-15-84

9. During interim status, containment is not required for short term storage. However, the inspector would like to address the waste pickle liquor (WPL) storage. The facility had three very large (20,000 gallons or larger) tanks of WPL, two of new acid and one caustic storage tank. These were provided with concrete containment. The fact that the facility tried to provide containment was good but not successful. Concrete is basic and would be expected to react with acid and deteriorate. Even if this were not the case, the containment structure was ineffective for all but center leaks on the tanks. Even drippage, let alone an actual leak from the tank ends, would not be contained. Another consideration is the potential of spillage from the caustic and acid tanks simultaneously or delivery of the wrong material to the wrong tank. This could result in high heat, pressure development and evolution of dangerous vapors. It is recommended that these aspects be reviewed.

You are requested to respond to this letter by November 16, 1984, providing documentation to this office regarding actions taken to correct these violations. Please send your response to the Northville address listed above in this letter.

If you have any questions regarding this matter, please feel free to contact this office at (313) 459-9180.

Sincerely,



Margaret A. Field's
HAZARDOUS WASTE DIVISION

MAF/sh
Enclosure

cc: J. Bohunsky
B. Okwumabua
EPS

COMPLAINANT'S EXHIBIT 9



3001 Miller Road
P. O. Box 1631
Dearborn, Michigan 48121-1631

November 15, 1984

Ms. Margaret A. Field's
Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
Northville, MI 48167

Re: MID087738431

Dear Ms. Field's,

In response to your letter dated October 15, 1984, concerning your visit to our facility on October 8, and 10, 1984, we have prepared the following comments corresponding to each of the items in your letter.

Item 1.B2a

Waste generating processes have remained relatively unchanged since the last waste analyses were performed and it is unlikely that the nature or character of the waste streams have changed significantly. However, the waste analysis plan does call for an annual analysis and all but two waste streams have been resampled since the MDNR visit on October 10, 1984. Flue dust from the Electric Arc Furnace was not resampled because that facility has been shut down for the past three months. The other waste, lite oil muck, is generated only when a lite oil storage tank is removed from service for cleaning. This waste will be resampled during the next cleaning cycle.

It has been suggested that more physical analysis should be included in the waste stream characterization and that the waste analysis plan should be rewritten. We are planning to engage the services of an independent consultant with experience in hazardous waste analysis and management to advise us on plan revisions and to assist in the analysis of our waste streams. The consultant will be visiting our facility during the week of November 19, 1984, to begin working with us.

Items 2.B4, C&D and 3.B5

The Spill Prevention Control and Countermeasure (SPCC)/Pollution Incident Prevention (PIP) plan was modified in 1981 to include hazardous wastes. The total plan is for the entire Rouge Manufacturing Complex which includes the Rouge Steel Company and seven other Ford Motor Company components. Each of these components is under separate management, but share a number of utilities including some sewers and outfalls. Primary responsibility for all outfalls, except 006, is to the Environmental Services Section, T&TO, A Ford Motor Company operations group.

November 15, 1984

Items 2.B4, C&D and 3.B5 (Continued)

Outfall 006 services the tailrace drainage area and is the responsibility of the Rouge Steel Company.

The SPCC/PIP plan was developed before the promulgation of federal hazardous waste management regulations. The plan included four liquid wastes generated by Rouge Steel Company which were subsequently characterized as hazardous wastes. After the promulgation of the hazardous waste management regulations three other wastes were included in the plan. As the plan was amended to address additional regulatory requirements, three procedures for reporting and responding to spills and emergencies evolved.

We have concluded, subsequent to the MDNR visit, that the plan is complex and that the portions relating to hazardous waste management must be separated from the existing plan and clarified. An independent contingency plan to address hazardous waste will be prepared and should be completed by March 1, 1985. The issues raised by the MDNR will be clarified in this revised plan so that the plan can be more easily audited.

With respect to training, the primary and alternate emergency coordinators have been enrolled in courses 050 and 055 of the Michigan Hazardous Waste Industry Training and Technical Assistance Program sponsored by Michigan State University. Other training needs will be addressed upon completion of the revised contingency plan.

Item 4.C1

The tar spillage in the tar pitch loading area has been removed and the area will be maintained. Maintenance on heaters in the naphthalene settling tanks has been completed and the tank covers have been replaced. This has remedied the problem of visible naphthalene crystals that the MDNR observed at the tar pitch pit.

Item 5.C6, D1b

The sections of the current SPCC/PIP plan pertaining to hazardous waste management are being separated from the plan and will be assembled for submittal to local police and fire departments, as well as the Oakwood and Henry Ford Hospitals. These organizations will be asked to acknowledge receipt of the plan using an accompanying acknowledgement letter as suggested by the MDNR. When the contingency plan is revised in 1985, it will also be submitted to these same agencies with instructions to discard the current plan.

Item 6.D1C

The present SPCC/PIP plan addresses three types of spill incidents as follows.

- . Spill incidents which pose a threat to public waters (excluding the tailrace drainage area).
- . Spill incidents which pose a threat to public waters from the tailrace drainage area (outfall 006).
- . Incidents involving hazardous wastes.

The SPCC/PIP plan has been updated to name the primary and alternate emergency coordinator for each type of incident. Copies of the revised sections are included.

Item 7. Appendix GN-B

The Rouge Steel Company ships hazardous waste from three locations.

The Hi-Line shipping office was erroneously identified by the MDNR as the shipping location for spent pickle liquor. Spent pickle liquor is shipped from the Cold Mill Shipping Office. Since your visit the manifests have been matched and are all accounted for. The Shipping Clerk has been reinstructed in the proper procedure. Until May, 1984, waste pickle liquor was being sold and was not a hazardous waste. It is now being manifested for disposal.

The gas line drip water is shipped out of the Hi Line shipping office and the MDNR did examine several manifests for the waste.

TSDF copies for three manifests in the Hi Line shipping office files were missing at the time of the MDNR visit. The TSDF copy for Manifest No. MI-0275266 has been received and is included.

With respect to Manifest Nos. MI-0275206 and MI-0275209 showing shipments of tar decanter sludge on January 4, and January 18, 1984, respectively, our investigation indicates that these manifests were erroneously generated and no shipment of this waste was made.

Neither the supervisor for the tar decanter sludge loading area, Mr. V. Miller, nor the driver of Truck No. 8292 (shown on the manifests), Mr. W. Barnes, have any recollection of the two transports in question.

Item 7. Appendix GN-B (Continued)

A log sheet, kept by the Ford Motor Company Allen Park Clay Mine (the disposal facility), was reviewed since they did not possess these two manifests. The log sheet is a record signed by the transporter upon arrival to the site and includes information on the Truck No., Waste Material, Quantity, and the Time In and Time Out of the facility. Explanations of these two manifests and the disposal facility's log sheet are below.

MI 0275206

Only the generator possesses a copy of the manifest. Neither the transporter nor the disposal facility have this manifest on record. The log sheet of FMC Allen Park Clay Mine shows no entry on 1-4-84 of W. Barnes, or Truck No. 8292, or any waste tar decanter sludge. Apparently the shipment never transpired.

MI 0275209

The generator and the transporter possess a copy of the manifest. The disposal facility does not have this manifest on record and the transporter's copy is without signature from the disposal facility. The log sheet of FMC Allen Park Clay Mine indicates W. Barnes transported debris to the clay mine at 1:31 p.m. Since this was not a hazardous material, a manifest was not given to the disposal facility. It appears Manifest No. MI 0275209 was erroneously generated.

The disposal facility log sheet for the month of January shows only one entry for tar decanter sludge - on 1-25-84.

Ms. Jeanne Lecker, Supervisor of MDNR Manifests, was also contacted and found no listing for Manifest Nos. MI 0275206 or MI 0275209 in the MDNR computer file. Other shipments of manifested wastes by the Rouge Steel Company in January 1984 were located in the computer file. This also suggests that shipments of tar decanter sludge were not made on January 4 or 18.

An EPA Exception Report is not necessary since it appears that hazardous waste was not shipped.

Item 8. Appendix GN-C.

The electric furnace dust silo was marked "Dangerous Hazardous Waste" during the inspector's visit. Signs for the other storage tanks have been ordered and will be installed on the tanks (see enclosure).

Page 5
November 15, 1984

Item 9.

The MDNR mistakingly identified the approximately two foot high concrete tank saddles as containment barriers. These concrete structures are the means of holding the vertical tanks off the ground. This area commonly referred to as the "tank farm" is not diked but the complete area under all of the tanks is covered by a 5 foot deep limestone bed which would effectively neutralize any spilled acid (see enclosed pages 54, 55 & 56 of the Oil and Critical Material Inventory of the SPCC/PIP Plan, non-tailrace drainage area). The area is attended by a employee classified as a "HCL Acid Farm Attendant". This person is located in a building in the farm area. An attendant is always on duty when there is any shipments of waste pickle liquor, when acid and caustic is received, or when the Cold Mill is operating. The attendant has gauges for each tank at his location which monitors for unusual changes in levels that would indicate a spill is occurring in the system.

In addition to having an attendant on duty when materials are transferred between the delivery trucks and tanks, the connections for acid and caustic tanks are different to prevent the delivery to the wrong tank. The connection between the acid tank or the spent pickle liquor (spent acid) tank and truck is a flange connection, secured by four bolts. The connection between the caustic tank and truck is a screw connection.

We have addressed or corrected all of the problems identified in your letter. Rouge Steel is committed to clarifying and simplifying other areas of our waste management program.

If you require any additional information please contact Mr. Doroshewitz at 323-1260.

Very truly yours,

J. A. Esper
J. A. Esper, Manager
Plant & Equipment Engineering

Enclosures

/GD

cc: J.A. Amber
K.K. Doyle
F.L. Pilzner
H.M. Schaeffer
J.A. Scott
W.W. Smith
H.I. Weinberg

COMPLAINANT'S EXHIBIT 10

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

January 23, 1985

Rouge Steel Co.
3001 Milten Road
Dearborn, Michigan

RE: MID 087738431

Gentlemen:

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment, storage, and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
Northville, MI 48167

If you have questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, reading "Benedict N. Okwumabua".

Benedict N. Okwumabua, PhD.
District Supervisor
Hazardous Waste Division

cc: U.S. EPA
J. Bohunsky
A. Howard



COMPLAINANT'S EXHIBIT 11

MAR 29 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rouge Steel Company
3001 Milten Road
Dearborn, Michigan 48121

Re: Letter of Warning
Rouge Steel Company
MID 087 738 431

Gentlemen:

On January 23, 1985, the Michigan Department of Natural Resources (MDNR) requested the Rouge Steel Company to submit a copy of their closure plan. To date, MDNR has not received the company's closure plan.

The MDNR is obligated to review the adequacy of closure plans under 40 CFR 265 Subpart G through the FY 85 Hazardous Waste Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA).

Because the Rouge Steel Company failed to submit a copy of their closure plan to MDNR, the U.S. EPA is requesting that Rouge Steel Company provide our Agency with a copy of the closure plan. Failure to provide this plan within 30 days of receipt of this notice will subject the facility to further enforcement action. Please forward a copy of an up-to-date closure plan to:

U.S. Environmental Protection Agency
Hazardous Waste Enforcement Branch
RCRA Enforcement Section - SHE-12
230 South Dearborn Street
Chicago, Illinois 60604

Two additional copies of the closure plan should also be sent to:

Michigan Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

If you have any questions, please contact Ms. Sharon R. Johnson of my staff at (312) 886-4592.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

cc: J. Bohunsky, MDNR
B. Okwumbua, MDNR
S.E. District Office

187 856 280 214
187 828 280 214

Sent to Rouse Steel Co	Postage 2.25	Special Delivery Fee 1.50	Restricted Delivery Fee	Return Receipt Showing Date and Address of Delivery	TOTAL Postage and Fees 3.75	Postmark or Date
Street and No. 3001 Wilton Rd	Certified Fee					
P.O., State and ZIP Code Dearborn, MI 48121						

PS Form 3800, Feb. 1982

PS Form 3811, July 1983

PS Form 3811, July 1983

INITIALS WEM	DATE 3-28	TYPIST RJ	AUTHOR RJ	STU #1 CHIEF R.K.	STU #2 CHIEF 3-28-85	STU #3 CHIEF	TPS CHIEF WEM	WMB CHIEF	WMD DIRECTOR
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COMPLAINANT'S EXHIBIT 12

APR 22 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas G. Weber
Rouge Steel Company
3001 Miller Road
P.O. Box 1631 Rm. 2110
Dearborn, Michigan 48121-1631

Re: Letter of Warning
Rouge Steel Company
EPA I.D. No.: MID 087 738 431

Dear Mr. Weber:

On March 29, 1985, the United States Environmental Protection Agency (U.S. EPA) issued Rough Steel Company a Letter of Warning for failure to submit its closure plan. 40 CFR 265, Subpart R provides that the owner/operator of a facility which disposes of hazardous waste by underground injection is excluded from the closure requirements identified in 40 CFR 265, Subpart G.

Based on your conversations with Pat Vogtman of my staff, and a review of your Part A application, it appears that Rouge Steel Company only disposes of hazardous waste via underground injection. Therefore, U.S. EPA has determined that Rouge Steel Company is not subject to 40 CFR 265, Subpart G, and, therefore, is not required to send U.S. EPA a closure plan.

If you have any questions, please call Pat Vogtman of my staff at (312) 886-4591.

Sincerely yours,

Richard C. Karl, Chief
MI/WI Unit
RCRA Enforcement Section

cc: Ben Okwumabua, MDNR

5HE-12JCK:PVOGTMAN:mholman:6-4591:4-19-85

INITIALS	DATE	TYPYST 4-22-85	AUTHOR 4-22-85	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
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COMPLAINANT'S EXHIBIT 13

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
CAROLLO
JACOB A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

May 21, 1985

Mr. Gerald Doroshewitz
Supervisor - Environmental Control
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, MI 48121-1699

RE: MID 087738431

Dear Mr. Doroshewitz:

On May 7, 1985, acting as a representative of the United States Environmental Protection Agency, I performed a reinspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of your facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

The initial inspection dated October 8 and 10, 1984, resulted with a company response dated November 15, 1984.

In the response the company set the following compliance dates. The status of each as of the reinspection are included below.

1. Waste analysis plan - No date was set for completion. This plan did not seem deficient but was in need of revisions. Waste stream sampling had been done but results and plan revisions were still pending.
2. SPCC/PIP/Contingency Plans - Projected completion date March 1, 1985. These plans had several serious problems which were complicated by the facility's organization and interrelationship with other company sites within the same complex. A draft plan was available and scanned but not reviewed. Prepared by a contractor, the plan promised to be comprehensive. The final plan will be submitted for review when available; this is expected by early June.
3. Training - The training needs were to be addressed upon completion of the revised contingency plan.
4. Tar Pitch Spillage - The operating procedures have changed to control and prevent tar pitch spillage. Future plans include new equipment which will eliminate this and control organic emissions.

Mr. Gerald Doroshewitz
May 21, 1985
Page 2

5. Notification of Local Agencies - The new contingency plan will be supplied to the local agencies when finalized.
6. Emergency Coordinator - To be resolved with the contingency plan.
7. Manifest Confusion - Resolved by the company's November response. This area will be evaluated during future inspections.
8. Hazardous Waste Marking - Completed. However, one comment; the electric furnace dust bin was reportedly labeled when initially inspected in October on the only side not observed, the side towards the plant. This was chosen because it was the side visible to your employees. This is logical and in most instances would seem adequate. Is there a potential for a truck driver driving up to the bin, receiving a load, and leaving without knowing the material was hazardous? Is there a potential for spill or fire fighting crews to be working in the area without knowing hazardous waste may be involved? If so, in this case the labeling of another side should be considered.
9. Containment - The previous letter sought to point out the potential for environmental and personnel exposures. Except for close proximity, the acid and caustic storage handling is reportedly well controlled so as to prevent mixing and personal exposure. The environmental protection afforded by the limestone bed is under review. It was confirmed that the area does not have containment, but there are no present requirements for containment of corrosives.

What hasn't been resolved is dependent upon the contingency plan which is expected to be in final form in June. It appeared that much thought and preparation was being put into the plan. The plan will be reviewed and commented upon as soon as a copy becomes available.

If you have any questions, please call me at (313) 459-9180.

Sincerely,



Margaret A. Field's
HAZARDOUS WASTE DIVISION

cc: U.S. EPA Region V
B. Okwumabua

COMPLAINANT'S EXHIBIT 14

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
CAROLLO
JOE A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

July 2, 1985

Rouge Steel Co.
3001 Miller Road
P.O. Box 1631 Rm. 2110
Dearborn, MI 48121-1631
Attn: Thomas Weber

RE: MID 087738431

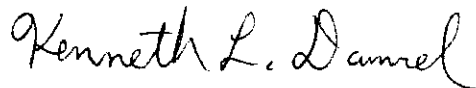
Dear Mr. Weber:

This letter is in regard to our January 23, 1985, request for a closure plan, U.S. EPA's letter of warning of March 22, 1985, and U.S. EPA's letter of April 22, 1985.

We are withdrawing our request for a closure plan based on information that Rouge Steel Co. is disposing of hazardous waste by underground injection and a closure plan is therefore not required.

Thank you for your cooperation.

Sincerely,



Kenneth L. Damrel
Environmental Engineer

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua

COMPLAINANT'S EXHIBIT 15



3001 Miller Road
P O. Box 1631
Dearborn, Michigan 48121-1631

March 26, 1986

Ms. Margaret A. Fields'
Hazardous Waste Division
Michigan Department of Natural Resources
Southeast Michigan Field Office
15500 Sheldon Road
Northville, Michigan 48167

RECEIVED
MAR 28 1986
U.S. EPA, REGION 5
HAZARDOUS WASTE MANAGEMENT DIVISION

Subject: Rouge Steel Company - EPA ID. No.: MID 087 738 431

Dear Ms. Fields':

In response to your inspection visit on March 14, 1986, this is to advise you that plant activities associated with the handling of decanter tar sludge (K087) at the Coke Ovens ceased on March 14.

The area you described, approximately 30 ft. by 30 ft., was located on a 827 ft. by 70 ft. concrete pad which formerly served as the foundation of a coke battery that was dismantled and removed in the mid-1930s. The area was covered with coke breeze (fine particles of coke that consist almost entirely of carbon). From March 20 to March 24, 1986, approximately 200 cubic yards of sludge, coke breeze, and soil were removed from this area for disposal at Wayne Disposal, Inc. The area was scraped down to the concrete foundation.

Following your visit, plant procedures for handling the sludge have been modified. As you know, one new sludge decanter has been installed with an above ground collection box. A steel plate has been welded to the box to close the open side. Construction to replace the other decanter is underway. Sludge from this decanter is currently collected in a concrete pit. Upon replacement of the second decanter, now scheduled to be on-line in June, sludge from both decanters will be collected in above ground steel boxes. Demolition of the old tar decanter -- which is scheduled for this summer-- will permit the old tar collection areas and grounds to be cleaned up. Upon your next visit to Rouge Steel Co., we would be pleased to show you these improvements, which are part of a \$2.3 million facility upgrade.

Sincerely,

A handwritten signature in cursive script, reading 'Gerald Doroshewitz'.
Gerald Doroshewitz
Environmental Control

cc: J. S. Amber
Laura Lodisio

COMPLAINANT'S EXHIBIT 16

RCRA INSPECTION REPORT

EPA Identification Number: 112 087738431
 Installation Name: ROUGE STEEL Co
 Location Address: 3001 MILLER RD
 City: DEARBORN State: MI 48121
 Date of Inspection 3/14/86 Time of Inspection (from) 9:30 (to) 5:30
 Person(s) Interviewed Title Telephone
GERALD DOROSHEWITZ SUPR/ENVIR CONTROL (313) 323-1260
RUDOLPH DAWSON ENVIRON ENGR " "

Inspector(s) Agency/Title Telephone
MARGARET FIELDS MDNR/EQA (313) 459-9180
LAURA LODISO USEPA/ (312) 886-7090

Installation Activity (mark only one box)

Inspection Form(s) -

- ☒ Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation A
- ☐ Treatment/Storage/Disposal (No Generation or Transportation) A
- ☐ Generation and Transportation B,C
- ☐ Generation Only B
- ☐ Transportation Only C

* → solidification
pit

✓ Well-filters 50/5/1 - Office

✓ Signs on old/new tarpit decanter & tote
will be diked
open in front
✓ spillage

✓ Haz Waste in Non H trash

✓ Elec Furnace
Inop area
BOF

Containers

* → 350 drums "scrap"
2 leaking drums
4 waste M.S. }

* Waste Acid 2 - Not material - Mark/Hos 85
Hof Ship 101 - Waste Ref Mop - Dr 1
440 MI 0574973
300 0574854

DEPARTMENT OF NATURAL RESOURCES

HAZARDOUS WASTE DIVISION

FI.) REPORT

☐ Complaint Inspection
☐ Compliance Inspection
☐ PEAS Investigation
☐ PCB Report/Complaint

☐ Act 64
☐ Act 136
☐ Act 245
☐ RCRA

Company/Facility ROUGE STEEL		Date HISTORY	Time
3001 MILLER RD		Facility No. WID 087738431	
City DEARBORN		Staff FIELD'S	

REMARKS:

FILE SUMMARY

8/11/80 Company filed an EPA Notification Form for GENERATOR / TSD / UNDERGROUND INJECTION
 11/17/80 Company filed a Part A only for the injection well.
 9/10/81 MDR letter returning 197 manifests because they had not been appropriately signed. Company was advised to contact Lansing MDR if they had any questions regarding manifest procedures.
 Jan/82 Waste Characterization Reports were filed for:
 4013 Asbestos pipe insulation - Power & Utility
 4013 Asbestos gasket material - Plant & Equipment
 D003 Coke Oven Drip Water - Iron Making Op.
 D003 Final Cooler Waters - Iron Making Op.
 K087 Decanter Tank Tar Sludge - Iron Making Op.
 D003 Light Oil Muck - Iron Making Op.
 D001 (Now F003) Light Oil Tank Sludge - Iron Making Op.
 K061 Electric Furnace Dust - Melting Op.
 7/19/82 MDR Notice of Violation - The facility was illegally disposing of hazardous waste leachate from the Allen Park Vaportrap.

8/5/82

Notice from Rouge Steel that effective Jan 1, 1982, the Ford Motor Steel Div became the Rouge Steel Company.

9/20/82

The site's first RCRA Inspection Participants - Doroschewitz, Porter of Ford, and Norton of MDR. The inspector clearly thought that the only regulated areas on site were the injection wells. In fact, the inspector wrote that the generator inspection segment of the form was, "Not applicable - No Off-Site Disposal".

10/19/82

MDNR letter to company regarding inspection results. No signs on the injection wells. Letter makes clear the only area under review were the wells. Company was sent a copy of the inspection report with the letter. Company letter states signs were posted. The company never advised the inspector that the report was in error or that any other wastes were generated.

10/22/82

11/12/82

MDNR letter stating the injection wells were in compliance.

11/29/82

1/26/83

MDNR letters regarding manifesting errors.

9/21/83

2nd RCRA Inspection

Participants: Weber-Ford & Norton-DNR

This inspection was a repeat of the first. It addressed only the injection wells and noted again that the site was not a generator of hazardous waste which was totally incorrect yet was not corrected by the company. MNR letter that the wells were in compliance.

10/19/83

10/8, 10/84

3rd RCRA Inspection

Participants: Ford - Dorosheewitz, & Porter MNR - Field's & Hubuckon.

Partly by accidently observing waste hauler activity and partly from familiarity with the business, questions were asked that identified an extensive generation of wastes. The site was in serious non compliance in several areas. MNR letter to company summarizing the inspection.

10/15/84

11/15/84

Company letter and several attachments in response.

3/29/85

MNR letter of warning to the company because they had not submitted a closure plan as requested.

4/15/85

MDNR (DANREL) notes in file summarizing a phone conversation with Ford's Tom Webber and EPA's Pat Vogtman. It was agreed that Rouge operated only an injection well and therefore was exempt from the closure plan requirement. A letter ~~retracting~~ ^{retracting} the letter of warning ~~was to~~ ^{was} be issued.

4/22/85

EPA letter withdrawing letter of warning

5/21/85

Reinspection (5/1/85) letter on the non compliance areas cited during October 84 RCRA Inspection.

Some unfinished work but tentatively considered in compliance.

7/2/85

MDNR (DANREL) letter withdrawing request for closure plan.

10/30/85

Company letter with attached revised emergency plan. It had been improved significantly but still had some weak spots.

11/04/85

Company letter to EPA for Interim Status Certification

3/14/86

4th RCRA Inspection.
Discussed in attached papers.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input checked="" type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

— X NA

b. Facility expansion?

— X NA

c. Change of owner or operator?

— — —

with new pickle liquor plan for UIC

→ 2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X — —

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X — —

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

X — —

However these did not address any contained or waste oils or cooling water filter mediums.

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

X — —

b. i. Artificial or natural barrier around facility?

X — —

and
ii. Controlled entry?

X — —

c. Danger sign(s) at entrance?

— — X

→ 4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

X — —

Add Tar Pits & New tote

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

X

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

ii. safety and emergency equipment?

iii. security devices?

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

Two areas as TSD are Tar Pits & UIC - only equip. app. are reportedly a shovel for tar & diking equip. for waters. Not approp. for this.

d. Are areas subject to spills inspected daily when in use?

X

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

X

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

X

ii. the name of the inspector?

X

iii. a notation of the observations made?

X

iv. the date and nature of any repairs or remedial actions?

X

Reported by but since spillage was allowed to sit for a week = obviously inadequate

5. Do personnel training records include: 265.16

a. Job titles?

b. Job descriptions?

Training is being expanded to include Right to Know & computerize personnel & training records will be completed this summer.

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Coke But Asia inadequate Elect</i>
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>
b. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>
c. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

☒ ☐ ☐ Tarpitch - see letter

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

☒ ☐ ☐ Telephones
Area near office

b. Telephone or 2-way radios
at the scene of operations?

☒ ☐ ☐

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

Basic spill control - shovels
tractor etc & lime stone

Indicate the volume of water and/or foam available for fire control:

Access to city & river water
Access avail to all hydrocarbons area although
not HCLA flammable - gas line
drips questionable.

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

NA The above equip
doesn't req
maint

b. Is emergency equipment
maintained in operable
condition?

NA

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

Alarm in light rail
area
Not needed

5. Is there adequate aisle space
for unobstructed movement?

NA outdoors

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ ☐ ☐ with recpts

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>but needs doc of training</i>
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

NOX — *Potential*
But had an acid tank leak handled according to plan
Noted during insp & repaired
Not followed for tar pit handling.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

*However not enforced
complied as tar pitch
handling not in
compliance with
requirements*

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— — —

discussed as before

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— — —

*Facility doesn't
wastes require this
& appars are
NA outdoor*

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X

w/ receipts

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?			<input checked="" type="checkbox"/>	
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?			<input checked="" type="checkbox"/>	

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>	—	—	<i>But not for 3 yrs in Acid area</i>
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>~200 examined</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>	—	—	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>	—	—	
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>	—	—	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	
g. Required certification?	<u>X</u>	—	—	
h. Required signatures?	<u>X</u>	—	—	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment.				<u>2 To Waste Acid but was explained on site No problem</u>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				<u>NA</u>

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	—	—	<u>X</u>	—
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	—	—	<u>X</u>	—
3. If required, are placards available to transporters of hazardous waste? 262.33	—	—	<u>X</u>	—
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	—	—	—	<i>could not be determined as observed containers had not been evaluated</i>
b. Have more than 90 days elapsed since the date inspected in (a)?	—	—	—	
c. Do wastes remain in accumulation tanks for more than 90 days?	—	—	—	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	—	—	—	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	—	—	<u>X</u>	—

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	—	—	<u>X</u>	—
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES NO NI Remarks

**** 1. Use of Manifest System 265.71**

a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

Does not accept waste from off site

b. Are records of past shipments retained for 3 years?

**** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72**

**** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.**

3. Operating Record 265.73

a. Does the owner or operator maintain an operating record as required in 265.73?

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

*****iii. A map or diagram of each cell or disposal area**

***** only applies to disposal facilities**

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>at pump ± 100' from well</i>
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>No spec req. were identified - No acid in area</i>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

*This area is not clearly regulated as such & whether closure might be necessary. No storage/questionable whether filter cartridges are haz / how to reg. closure. Checked w/ Q-1
Considered exempt under 265.1(c)(9) 4/82-A
as a totally enclosed system.*

COMPLAINANT'S EXHIBIT 17

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

T. S. J. ANDERSON
M. L. J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director
S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

April 15, 1986

RECEIVED

MAY 14 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Mr. P.T. Sullivan, President
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, MI 48121

RE: MID 087738431

Dear Mr. Doroshewitz:

On March 14, 1986, acting as a representative of the United States Environmental Protection Agency, I and Laura Lodisio of USEPA, performed an inspection of your facility located at the above address. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of Subtitle C of RCRA. Specifically, the following was found:

1. 40 CFR 262.11. This section requires generators to evaluate all wastes to determine whether they are hazardous. Once evaluated to be hazardous these wastes must be labeled, dated, stored, included in a contingency plan and personnel training, etc.

The only waste evaluation available was for the sites bulk wastes and the listed trichloroethane solvent. During the inspection the company representatives stated that they did not have any containerized hazardous waste. It was later determined that the site had parts cleaners in the powerhouse, and other areas, including one that properly manifested a Safety Kleen mineral spirits operations waste. The site also had four drums labeled mineral spirits which appeared to be waste because of condition and if so would be a flammable hazardous waste. These were reportedly from the site's paint shop. Until these had been observed there had been no mention of any paint shop which would be expected to also generate listed hazardous solvents and other hazardous wastes. The site also had over fifty drums of scrap oil in storage. There was no record of the facility ever identifying these various waste streams, evaluating them, etc.

Mr. P.T. Sullivan, President
Rouge Steel Co., Dearborn, MI
RE: MID 087738431

The site also had two filter systems in use on the hazardous waste cooling waters prior to injection. The diatomaceous earth/sand and fabric filter mediums were being disposed of as non-hazardous, yet there was no waste evaluation available.

2. 40 CFR 262.34(a), 265.14(c), 265.17(a). These sections refer to various signs required to be posted.

The site has repeatedly failed to provide the required signs. After the 1984 inspection it was addressed at the coal tar pitch and the electric furnace dust areas. During this inspection none of these areas had the required signs. However, part of this was understandable. The sign on the electric furnace dust storage had fallen on the ground and had not been replaced. It should be noted that even when in place, the sign would not be seen by a truck driver during approach or pickup of the waste. The tar pitch area had been under construction for approximately four months. The new tar pitch decanter had been in use during this period and was not marked. The old tar pitch areas (north and south) had signs posted after the 1984 inspection. No signs were posted at the time of this inspection. However, it was thought they had been removed with the construction work on the south tar pit, during the past four months. An area overlooked during this inspection was the gas line drip oil/muck oil storage tanks. If these are hazardous waste storage tanks they also need the appropriate signs.

3. 40 CFR 265.31. This section states that facilities "must be maintained and operated to minimize the possibility of . . . any unplanned sudden or non sudden release of hazardous waste . . ."

During 1984 RCRA inspection, the facility was cited for tar pitch spillage in the loading area. The facility reported cleaning this up and said the area would be maintained.

During this inspection there was tar pitch spillage observed in the construction area which may or may not be expected. What wasn't acceptable was spillage around the recently installed tar pitch decanter. The east end dumped into a metal container open on the top and except for a four inch lip, open in the front. When inspected, the container held standing liquids just below the front lip and a center mound of solids \approx 8 inches high. In front of the container was a pile of tar pitch (\approx 5 gallons) on the ground. This was reportedly spillage from emptying the container which was last done almost a week earlier. Nearby was a non-hazardous refuse collection area. Another estimated five gallons of tar pitch had been dumped in with cardboard and rags and coated with sand. This constituted improper disposal.

Page 3

Mr. P.T. Sullivan, President
Rouge Steel Co., Dearborn, MI
RE: MID 087738431

4. 40 CFR 265.16. This section requires a facility to train personnel that handle the wastes. The training should consist of the hazards of the material, proper everyday handling procedures and contingency (emergency) procedures.

The company was cited for lack of training after the 1984 inspection. The company stated during the May, 1985 inspection that training needs would be addressed after the revision work on the contingency plan was completed. This was logical. The finished contingency plan was submitted October 30, 1985. Without any details, this plan states that training will be given.

During this inspection, when asked to see the training records and information, the company supplied a one-page sheet that discussed the training supplied in each area. These were vague and incomplete. At the time these were thought to be the new plans the company referred to above. However, during a background file search for this letter, an almost exact copy of the training papers dated 1981 were found. A copy is attached. The facility obviously never revised these or developed new ones.

- It was pointed out to the company representatives that this training detail was insufficient. This was more than evident in that: (1) the tar pitch spillage was left for a week; (2) tar pitch was discarded in with non-hazardous debris; (3) no respirators were in use in the tar pitch construction area; and (4) the facility had been illegally solidifying hazardous waste without a license (discussed below).
5. 40 CFR 270.71. This section requires that during interim status a "facility shall not: (1) Treat, store or dispose of hazardous waste not specified in Part A of the permit application; (2) employ processes not specified in Part A of the permit application: . . ."

During the inspection, the injection well shed was being vacuumed clean of standing liquids. When asked what was done with this material, the inspectors were told that it was solidified in the same pit as the runny tar pitch such as that in decanter container. The solidification pit was observed to the east of the well head. It appeared to be a depression of liquids within black particulates. The area was approximately a square sixty feet on a side. This was adjacent to a coal pile and it was difficult to tell where the coal spills stopped and the pit began. The entire area appeared to be on unprotected soils. As no liquids are allowed in a waste pile, this area could only be described as a lagoon.

Page 4

Mr. P.T. Sullivan, President
Rouge Steel Co., Dearborn, MI
RE: MID 087738431

This solidification operation also results in the facility being in violation of:

- (1) Notification
- (2) Liner requirements
- (3) Groundwater monitoring
- (4) Certification
- (5) Closure

A nearly concrete area was observed. According to plant personnel this was built to replace the solidification area pit. The company representative stated they were fully aware of the importance and emphasis placed on land disposal units and that they weren't supposed to be solidifying the tar pitch from the new decanter process. This indicates on going knowledge as well as the fact that a major expenditure was made to construct the concrete area. According to a company letter dated March 26, 1986, this operation has ceased. A copy of the letter is attached.

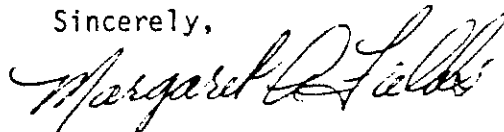
6. 40 CFR 262.40. This section covers the manifesting requirements for generators. It includes maintaining copies for three years.

The facility was cited for manifest violations during the 1984 inspection. These were corrected. However, the company apparently failed to explain the requirements fully as this inspection found that copies were being retained for only one year.

This inspector believes that it is obvious from the attached file summary that the facility's regulated portions and related compliance expands with each inspection as forced to by the inspector. As the facility is so large and the history indicates substantive and repetitive noncompliance, it is being recommended that this facility be inspected more thoroughly in the future. This could be done by one person on a quarterly basis or one inspection by three inspectors.

You are requested to respond to this letter within thirty-days providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,



Margaret A. Fields
Hazardous Waste Division

MAF/aw

cc: Gerald Doroshewitz, Rouge
~~Laura Lodisio, EPA~~
AT Howard, HWD, Permits

Jerry Amber, SSECO, Ford
Ben Okwumabua, District Supervisor

COMPLAINANT'S EXHIBIT 18



3001 Miller Road
P. O. Box 1699
Dearborn, Michigan 48121-1699

May 15, 1986

RECEIVED

MAY 19 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Ms. Margaret A. Field's
Department of Natural Resources
S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

Subject: MID 087738431 RCRA Inspection
March 14, 1986

Dear Ms. Field's:

Mr. P. T. Sullivan has asked me to respond to your letter dated April 15, 1986, concerning your visit to the Rouge Steel Company on March 14, 1986. The items identified in your letter are addressed in order as follows:

1. Containerized solvents were being reclaimed by Safety-Kleen Corp., and manifested properly. As you know, the EPA revised and broadened its regulation effective July 5, 1985, to include recycled and reclaimed solvents. The waste characterization for the solvent material to be reclaimed, as required by 40 CFR 262.11, has been completed and will be included as part of the "Hazardous Materials Spill Control And Counter Measure Plan" (HMSCCMP) to be revised no later than August 1, 1986, which will also include the Safety-Kleen Corp. equipment used in the plant.

The waste mineral spirits you refer to were inadvertently placed in the cold rolling mill oil yard. These materials result from the cleaning of brushes, rollers, and other related painting equipment. To avoid future handling problems, Safety-Kleen Corp. has been contracted to provide cleaning equipment and to remove the solvent for reclamation (installed on May 14, 1986, copy of order included).

Since your visit, we have determined that the "drums of scrap oil" referenced in your letter were surplus virgin oils placed in the cold rolling mill oil yard by the Cold Mill Maintenance Department, which no longer uses these particular oils. These oils are being retained for usage in other departments. Our review of the material safety data sheets for the identified oils indicates that even if they were to be disposed of in the future, they would be non-hazardous under current regulations. These drums were labeled "scrap" because the Maintenance Department no longer had use for the oil, and to avoid confusing these materials with products which they continue to use. All of the empty drums have been removed from the yard for disposal.

The waste characterization for the material resulting from the filter system used prior to injection of the final cooler water into the deep-well will be completed after laboratory results are obtained. If the waste is characterized as hazardous, the characterization will also be included as part of the HMSCCMP. In the meantime, these wastes are assumed to be hazardous per 40 CFR 262.11 (c) (2) and are disposed of with the tar decanter sludge. This is a continuation of past practice.

2. We disagree with your assertion that the facility has repeatedly failed to post signs. As noted in your letter, the sign at the Electric Arc Furnace had fallen to the ground. The sign has been replaced with two signs (with improved corrosion protection) at both the east and west approaches to the flue dust process silo. A new sign has also been placed on the new tar decanter collection box. Construction of the other new tar decanter is continuing, and is expected to be complete by mid-June, 1986. In the interim, the sign at the old decanter (still in service) has been replaced.

Your reference to the "gas line drip oil/muck oil storage tanks" apparently refers to two different types of materials. There are several tanks used to collect condensate, known as "gas line drips", from the coke oven gas distribution system. These tanks are labeled "Hazardous Waste", where appropriate, but due to the secondary containment around the tanks, the labels may not be readily observed from a passing automobile. Additional signs have now been fastened to the dikes surrounding these tanks. "Gas line drips" consist primarily of water containing small amounts of cyanide. Ford Motor Company Central Laboratory has been equipped to analyze this material in accordance with the "Test Method to Determining Hydrogen Cyanide Released from Wastes" as described in a USEPA memorandum from Eileen Claussen, Director, Characterization and Assessment Division, dated July 12, 1985. The test for total available cyanide and total available sulfide will be conducted during the week of May 12, 1986, to determine if the "gas line drips" could be considered a non-hazardous waste. The other tanks referred to are the light oil muck tanks used approximately once in every two month period, when cleaning the oil decanters. The light oil muck is removed from these tanks within a few days after collection. Signs have been posted on these tanks.

3. "Tar pitch" is a product sold by the plant to Allied Chemical for further processing for ultimate use, among other things, as a wood preservative, roofing material, and for electrode manufacturing. The tar pitch observed in the vicinity of the tar decanter construction area and the nearby non-hazardous refuse area is not "tar decanter sludge", and it is not a listed or characteristic hazardous waste. It is normal, but not required practice, to dispose of any tar pitch spillage with the tar decanter sludge.

The front of the new tar decanter sludge collection box was originally constructed to allow easy access for cleaning. A new steel plate has been welded to the box to close the front of the box, and a deflector belt installed on the decanter chute to prevent inadvertant spillage. The material collected in this box is now charged back to the coke ovens.

The spillage in front of this box purportedly occurred when material was removed from the box with a front end loader the previous week. Since the installation of the front plate, a suction truck is used to remove the sludge from the box, which should eliminate spillage.

4. We disagree with your assessment that the training failed to meet the minimum requirements of 40 CFR 265.16 (a)(3), pertaining to proper everyday handling and emergency procedures. We do agree that training did not specifically address the hazards of the material. This is not, however, a requirement of 40 CFR 265.16. It is currently being generally addressed by required OSHA training under the "Hazard Communication" (HAZCOM) program for all Rouge Steel Company employees.

We will revise our hazardous waste training program to include HAZCOM type of training for specific hazardous wastes. We expect to complete preparation of training materials by August 1, 1986. Hazardous waste on-the-job training for affected personnel was most recently completed during the period from May 1985, to March 1986. Copies of the signature sheets from those training sessions are included. Affected personnel will be retrained using the new program. We expect to complete the new round of training by October 1, 1986.

As discussed in Paragraph 3 above, tar pitch is not a hazardous waste and not subject to RCRA Regulations. Furthermore, neither RCRA nor OSHA require use of respirators in the tar pitch area. Respirators are available to employees who desire to use them.

5. In your letter of April 15, 1986, you stated that this area appeared to be on unprotected soil and could only be described as a lagoon operated in violation of RCRA Regulations. We disagree and assert that, although some material may have been temporarily placed on top of part of the area, there is a continuous concrete pad that extends throughout the entire area. As a result of the concrete pad, there was no risk of any release to the environment. In any event, the use of the concrete pad has been discontinued.

As stated in the Rouge Steel letter of March 26, 1986, the material from the area was removed down to the concrete pad, between March 20 and March 24, 1986. Fourteen truck loads were transported to Wayne Disposal. Copies of the shipping documents and manifests are included with this letter.

As you recommended, we did explore the possibility of handling the tar decanter sludge as a waste for treatment at Michigan Disposal and eventual disposition at the Wayne Disposal Landfill. However, Michigan Disposal is not licensed to treat K087. In fact, there is currently no facility in Michigan, other than Wayne Disposal, that is actively either treating or disposing of tar decanter sludge. For your information, we are now recharging this material along with the coal into the coke oven batteries, as is the practice at other coke plants.

6. We don't know where the inspector got the impression that manifests were being retained for only one year, when in fact, all three shipping locations have been retaining the manifests since the advent of RCRA. This impression may have been caused by the fact that prior to early 1984, all of our waste pickle liquor (WPL) was being reused in the City of Detroit Sewage Treatment Plant for waste water treatment and was exempted from manifesting as a hazardous waste. Also, a change in transporters used to move the WPL occurred. No manifests were generated for the new vendor before he began operations at our plant, and therefore, none would appear in his file and none would be available for review. In keeping with Company policy on records retention, a procedure has been initiated for retaining the manifests for a three year period as required by 40 CFR 262.40.

In your letter of April 15, you stated that the file summary discloses that with each inspection, the regulated portion of the facility is expanded, and that more frequent inspections are recommended. We disagree with your conclusion and with your recommendation. Pages 2 and 3 of the file summary suggest you believe that the Company failed to identify itself as a waste generator during prior inspections of the "facility." It is clear from the file summary and our own information, however, that these inspections covered only the hazardous waste disposal wells, and that references to "facility" included only the area of the wells. The MDNR inspector for the first and second inspections was informed that Rouge Steel Company both generated and shipped other wastes off-site. The inspector was also shown the waste characterizations which included all the wastes generated throughout the Rouge complex under the control of Rouge Steel Company (formerly Ford Steel Division). The inspector's reaction, at the time, was that the only interest was in the deep-wells. Page 1 of the summary reflects that proper and appropriate notifications for other wastes at the Rouge Complex were made to EPA, and that both waste characterization reports and hazardous waste manifests for these wastes were submitted to the MDNR.

We have no objection to inspections of Rouge Steel Company as provided by applicable federal/state hazardous waste management regulations. We do not believe, however, that past inspections reflect a need for more frequent inspections.

Very truly yours,

G. Doroshewitz

G. Doroshewitz, Manager
Environmental Engineering Department

cc: J. Amber
A. Howard
L. Lodisio
B. Okwumabua
P. Sullivan *PS*
H. Weinberg

Previous P. N. Number (s)		Specifying Department Approval		Using Department Approval		Serial Number 620342	
Suggested Vendor		Shipper Number				Date Issued 4-2-56	
		RS-					

Expedite Information					Date Required	
Ship To Attention Of F HOME		Address Inquiries To Name Schwartz		Phone 47651	Location BLD-	Specifying Dept. 1713

Expedite Instructions POINT SOURCE CONTAMINATION HEALTH & SAFETY					Type Of Order Normal Emergency X	
--	--	--	--	--	---	--

Ship To Code CE	Project No.	Work Order Number (s)					Analyst Code
		1	2	3	4	5	

P. N. Number 859021	Order Quan. 1	Unit Meas. Sq. Ft.	Ford Code Or Item No. 64	Ford Std.	Ford Blue Print	Ford Detail/Pattern	Pat. Req.	Est. Total Value 16.25
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Item Description FOR CLEANING paint-in equipment such as paint barrels, roller drums & spray guns - paint & thinners To eliminate the odor of Solvent on all parts. \$10.25 per hr. Cost from 10/4/56 of 6.00

Special Shipping Instructions To Vendor	Vendor No.	Blanket No.	Date Confirmed

P. N. Number	Order Quan.	Unit Meas.	Ford Code Or Item No.	Ford Std.	Ford Blue Print	Ford Detail/Pattern	Pat. Req.	Est. Total Value

Item Description

Special Shipping Instructions To Vendor	Vendor No.	Blanket No.	Date Confirmed

Account Classification					APPROVAL	Remarks To Procurement Control - Explain Reason For Single Source Or Emergency Handling
#	Gen	Acct.	Using Dept.	%		
1		2541	17			
2						
3						
4						
Procurement Control Remarks To Purchasing						



April 21, 1986

Ford Motor Co.
Fred Schwartz
Rouge Steel
Dearborn, Mi. 48121

Dear Mr. Schwartz

This letter is in reference to your recent quotation request regarding Safety-Kleen's Washer Service.

Safety-Kleen Corp. provides the parts washer machine and solvent in one charge applicable to each service. Service, performed by Safety-Kleen's representatives, includes clean solvent, removal of dirty solvent, replacement of filter bag and cleaning inspection of the machine. Frequency of service is determined at the onset of the service contract.

The quotation is as follows.

<u>Model No.</u>	<u>Service Interval</u>	<u>Cost Per Svc. Per Unit</u>
44	4 weeks	\$101.25

There is a one time start up fee of \$60.00.

Sincerely yours,

Ronald Conrad
Branch Manager

SIGNATURE SHEET

RCRA

(PLANT OR DEPT EQUIPMENT RELATED TO WW'80/81 TIME _____ DATE JULY 85 ETC.

	DEPT. NO	S.S. #	SIGNATURE		DEPT. NO.	S.S. #	SIGNATURE
1	7250	365-52-3823	MAYCAND MAYCAND	26	7250	207-28-	3842 A. Curtis
2	7250	365-62-7737	L. J. Warka	27		425-54-	2042 Thomas D. Dugals
3	7250	385-50-5713	H. J. Warka	28		769-56-	7237 E. F. F. O.
4		382-52-2077	M. J. Warka	29		207-28-	7779 F. S. F. O.
5	7250	36-8-18	M. J. Warka	30		365-40-	9796 J. J. Warka
6	3721	370-72-3721	D. J. Warka	31			
7	7250	382-62-3875	D. J. Warka	32			
8	7250	366-58-9426	E. J. Warka	33			
9	7250	363-78-5729	M. J. Warka	34			
10	7250	382-72-6657	R. J. Warka	35			
11		375-56-2691	A. J. Warka	36			
12		370-22-2497	A. J. Warka	37			
13	7255	357-52-8670	H. J. Warka	38			
14		364-56-0195	T. J. Warka	39			
15				40			
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24				49			
25				50			

CONFERENCE LEADER

2

SIGNATURE SHEET

RCCA

PLANT OR DEPT. _____ TIME _____ DATE JULY 85

	DEPT. NO.	S.S. #	SIGNATURE		DEPT. NO.	S.S. #	SIGNATURE
1	7251	241-74-66	98 R. TRANHAM	26	7250	207-28	3842 R. CURTIS
2		236-74-13	92 P. WILSON	27		425-54	2042 J. WILSON
3		466-38-12	77 R. R. R. R.	28		369-56	7237 E. E. E.
4		428-80-77	50 J. E. Knight	29		367-38	7799 T. J. E. E.
5		239-64-31	54 HUNT	30		365-46	1798 J. E. E.
6		284-78-47	46 E. E. E.	31			
7				32			
8		23964-3184	Bobby W. H.	33			
9				34			
10				35			
11				36			
12				37			
13				38			
14				39			
15				40			
16				41			
17				42			
18				43			
19				44			
20				45			
21				46			
22				47			
23				48			
24				49			
25				50			

CONFERENCE LEADER _____

SIGNATURE SHEET

1	1743	363 52 6550	Samuel Deyton	27		
2	1743	8110	S. Caldwell	28		
3	1743	1859	J. Shaylor	29		
4	1743	2193	R. Wallace	30		
5	1743	5808	W. F. Edwards	31		
6	1743	3231	Donald McLeary	32		
7	1743	6551	Wayne R. Ober	33		
8	1743	6079	William D. Pisella	34		
9	1743	1771	R. B. Storn	35		
10	1743	4586	R. Jamieson	36		
11				37		
12				38		
13				39		
14				40		
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18				44		
19				45		
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21				47		
22				48		
23				49		
24				50		

#2 Shift

SIGNATURE SHEET

RCRA

PLANT OR DEPT ET Plants TIME _____ DATE 11/25/88

	DEPT. NO.	S.S. #	SIGNATURE		DEPT. NO.	S.S. #	SIGNATURE
1	1743	4140	Charlie Simon	26	1711	8559	HA Robinson
2	1743	2808	Carl Shimmell	27	1743	2939	A. J. Keph...
3	1743	4555	Larry Zalusky	28	1743	1982	P. (C) Jackson
4	1743	5753	...	29	1743	0862	Mike Fitzgerald
5	1743	3212	Dan Port	30	1743	8841	R. ...
6	1743	0484	Frank Simon	31			
7	1743	4391	P. ...	32			
8	1743	4634	Joe Kovatch	33			
9	1743	6143	...	34			
10	1743	0145	...	35			
11	1743	2504	Cathy M. Collins	36			
12	1743	8697	M. Conti	37			
13	1743	9137	...	38			
14	1743	3605	Walter Jackson	39			
15	1743	1037	Sam J. Hill	40			
16	1743	6351	...	41			
17	1743	4147	...	42			
18	1743	5795	P. ...	43			
19	1743	9300	R. ...	44			
20	1743	7548	John R. ...	45			
21	1743	0212	...	46			
22	1743	2391	Stedz	47			
23	1743	5168	Montie	48			
24	1743	3295	Roberson	49			
25	1743	9955	Chelman	50			

Simonson

Shift

SIGNATURE SHEET

ACR

PLANT OR DEPT. EESS 1743 TIME _____ DATE _____

	DEPT. NO.	S.S. #	SIGNATURE		DEPT. NO.	S.S. #	SIGNATURE
1	1743	3161	Charles J. Jones	26			
2	1743	9487	Geo. Lucas	27			
3	1743	5014	W. D. Young	28			
4	1743	0678	J. L. Green	29			
5	1743	1001	Wm. S. King	30			
6	1743	7378	H. T. Shanks	31			
7				32			
8	1743	3761	J. J. Wells	33			
9	1743	2755	William F. Hanks	34			
10	1743	5043	Ronald L. Hanks	35			
11				36			
12				37			
13				38			
14				39			
15				40			
16				41			
17				42			
18				43			
19				44			
20				45			
21				46			
22				47			
23				48			
24				49			
25				50			

CONFERENCE LEADER _____

RCRA TRAINING

The employees listed below have attended an annual review of initial RCRA Training.

PLANT or DEPARTMENT 3650 GENERAL Time _____ Date 03/05/86

NO.	DEPT. NO.	JOB CLASSIFICATION	SOCIAL SECURITY NO.	SIGNATURE . . .
1	3650	Acid MAN	205-32-7716	Stanley D. Fasmala
2	5550	F.T.MAN	383-32-6164	C. B. T. PETER
3	3650	T.F.A.	430-38-6013	Nathaniel Spitzer
4	3650	Rail Man	433-014137	Elyde, Richard L.
5	3650	Tank Farm	235-76-923	Arthur R. Moore
6				
7				
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Conference Leader _____

RCRA

SPILL PREVENTION TRAINING

SIGNATURE SHEET

Plant or Department _____

Date 5-8-85

	Dept. No.	Signature	Position Title
-6909	1 3650	Kevin H. Ames	#2 CLN OK
-4652	2 3650	Jose Hodge	pit #1 ABLE OK
-5756	3 3650	Thomas H. Hays	Utility OK
-5086	3 3654	Joseph Garcia	" " OK
-3338	5 3651	W. J. Edwards	Utility OK
-0594	6 3650	William T. Tamm	Hooker OK
-8674	7 3650	William T. Tamm	Hooker OK
-3747	8 3650	Robert L. Lark	Hooker OK
-7419	9 3650	W. H. Houtman	Cleaner #2 OK
-7216	10 3650	ETVING TA MPET	cleaner #2 OK
-4934	11 3650	Philip L. Kade	# CLEANER OK
-4588	12 3650	Margaret A. O'Har	#3 Cleaner OK
-0036	13 3650	Richard R. Richardson, Jr.	Hooker OK
	14		
	15		
	16		
	17		
	18		
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	21		
	22		
	23		
	24		
	25		

Training Session Leader _____

SIGNATURE SHEET

RCRA

PLANT OR DEPT. POWER CONST, DEPT 6717 TIME _____ DATE 1-13-86

	DEPT. NO	S.S. #	SIGNATURE Print Name		DEPT. NO.	S.S. #	SIGNATURE Print Name
1	6717	385-52-6333	Edward SALAMON	26			
2	6717	382-44-8555	G. Russo	27			
3	6717	365-43-1186	Ron Priskorn	28			
4	6717	365-20-173	MPTT K EOWAN	29			
5	6717	382-30-9032	THOMAS E. QUICK SR	30			
6	6717	369-28-5129	RICHARD W. MAIDENS	31			
7	6717	422-72-1326	R. PRITCHETT	32			
8	6717	378-30-1362	C. BRANDT	33			
9	6717	371-86-3218	F. ALKASS	34			
10	6717	382-48-3222	C. ALKASS	35			
11	6717	376-34-5721	C. O'DONNELL	36			
12	6717	378-44-6208	R. WIECKOWSKI	37			
13				38			
14				39			
15				40			
16				41			
17				42			
18				43			
19				44			
20				45			
21				46			
22				47			
				48			
				49			
25				50			

CONFERENCE LEADER _____

SIGNATURE SHEET

RCRA

PLANT OR DEPT.

Power House 6712

TIME

DATE

11-19-85

	DEPT. NO.	S.S. #	SIGNATURE <i>Print Name</i>		DEPT. NO.	S.S. #	SIGNATURE <i>Print Name</i>
1	6712	375-40-0139	STEVEN R. SHEPPIE	26			
2	6712	374-40-1550	Richard T. Pawlik	27			
3	6712	373483658	W. Stevenson	28			
4	6712	275-442665	J. H. H. H.	29			
5	6712	380-302579	HERBY K. KATZ	30			
6	6712	385-463546	JOHN O'BRIEN	31			
7	6712	439242081	B. L. Olanie	32			
8	6712	385-52-7800	RICHARD CHAPPELL	33			
9	6712	365-482184	Marion Corney	34			
10	6712	378-54-7666	Ronald Hubble	35			
11	6712	373427661	George Castle	36			
12	6712	283-42-0460	Walter Haddy	37			
13	6712	407322288	B. B. B.	38			
14	6712	379-40-9102	R. KASLOWSKI	39			
15	6712	266-62-0800	A. Olsen	40			
16	6712	372-56-5778	J. P. P.	41			
17	6712	378-40-2929	P. P. P.	42			
18	6712	375-444466	G. A. CIESLA	43			
19	6712	384-56-4673	P. A. MacLachlan	44			
20	6712	386-504288	C. CHANDLER	45			
21	6712	376349484	R. Cicotta	46			
22	6712	198-28-5088	J. H. Sheane	47			
23	6712	298-54-1328	P. P. P.	48			
24	6712	375-42-7774	W. H. H.	49			
25				50			

CONFERENCE LEADER



MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

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Required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1989.

Failure to file is punishable under
section 296.548 MCL or Section 10 of
Act 136, P.A. 1989.

Please print or type

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST			1. Generator's US EPA ID No. MD-0000000000	Manifest No. 000000	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address BOUGE STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING HAZARDON, MICHIGAN 48121					A. State Manifest Document Number MI 0056407				
4. Generator's Phone (313) 323-1260					B. State Generator's ID				
5. Transporter 1 Company Name FOED MOTOR CO.					C. State Transporter's ID				
6. US EPA ID Number MD-0000000000					D. Transporter's Phone				
7. Transporter 2 Company Name					E. State Transporter's ID				
8. US EPA ID Number					F. Transporter's Phone				
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MD-0000000000					G. State Facility's ID				
10. US EPA ID Number					H. Facility's Phone				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) a. X HAZARDOUS WASTE SLUDGE, N.O.S.					12. Containers No. Type	13. Total Quantity	14. Unit M/Vol	15. Waste Code WM	
					1	DT	14	T	1-000
Additional Descriptions for Materials Listed Above					Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information WAS DECAFTER SLUDGE. TRUCK NO. 0100-1785 VEHICLE I.D. NO. H-1015									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.									
Printed/Typed Name JOSEPH SMITH					Signature <i>Joseph Smith</i>		Date 3/20/86		
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name SP...					Signature <i>SP...</i>		Date 3/20/86		
18. Transporter 2 Acknowledgement or Receipt of Materials									
Printed/Typed Name					Signature		Date		
19. Discrepancy Indication Space 89223									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name P...					Signature <i>P...</i>		Date 3/20/86		

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN BY 1-800-292-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE CENTER AT 1-800-292-4706 24 HOURS PER DAY.

GENERATOR

TRANSPORTER

FACILITY



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

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Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1989.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1989.

Issue print or type

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MD-087730431		Manifest No. 00710		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address ROCK STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING HARBOR, MICHIGAN 48121						State Manifest Document Number MI 0856408							
4. Generator's Phone (313) 323-1260						State Facility's ID							
5. Transporter 1 Company Name FORD MOTOR CO.						State Transporter's ID							
7. Transporter 2 Company Name						State Transporter's ID							
9. Designated Facility Name and Site Address MAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN						State Facility's ID							
10. US EPA ID Number MD-048090633						Facility's Phone							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No. H/M	
a. 1 HAZARDOUS WASTE SLUDGE, H.O.B.						1 DT		24		Y		1-007 H	
b.													
c.													
d.													
Additional Descriptions for Materials Listed Above						Handling Codes for Materials Listed Above							
15. Special Handling Instructions and Additional Information WAS DECAPTER SLUDGE. TRUCK NO. 8115 1571 VEHICLE I.D. NO. 4.0681													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.													
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.													
TO THE BEST OF MY KNOWLEDGE & BELIEF.													
Printed/Typed Name JOSEPH SMITH						Signature <i>[Signature]</i>						Date Month Day Year 3/10/86	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>						Date Month Day Year 3/10/86	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature						Date Month Day Year	
19. Discrepancy Indication Space 89260													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.													
Printed/Typed Name R. KERNIS						Signature <i>[Signature]</i>						Date Month Day Year 4/14/86	

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 817-373-7880 AND THE NATIONAL RESPONSE CENTER AT 1-800-282-4708 ON OUT OF STATE AT 817-373-7880 AND THE NATIONAL RESPONSE CENTER AT 1-800-282-4708 24 HOURS PER DAY



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Required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1989

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section 299.548 MCL or Section 10 of
Act 136, P.A. 1989.

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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MD-007739431	Manifest Do 00317	2. Page 1 of 1	Information in the shaded areas is not required by Federal law
3. Generator's Name and Mailing Address ROOSE STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING BEAR-ON, MICHIGAN 48121			4. State Generator's ID MD 0856409		
4. Generator's Phone (313) 303-1260			5. State Transporter's ID		
5. Transporter 1 Company Name POED MOTOR CO.			6. Transporter's Phone		
6. US EPA ID Number MD-000007730			7. State Transporter's ID		
7. Transporter 2 Company Name			8. Transporter's Phone		
8. US EPA ID Number			9. State Facility's ID		
9. Designated Facility Name and Site Address WATNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MD-042090633			10. Facility's Phone		
10. US EPA ID Number			11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)			12. Containers		
			No.	Type	13. Total Quantity
a. X HAZARDOUS WASTE SLOUGH, N.O.S.			1	MT	24
b.					
c.					
d.					
14. Additional Descriptions for Materials Listed Above			15. Handling Codes for Wastes Listed Above		
			a/ 1		
			b/ 1		
			c/ 1		
			d/ 1		
15. Special Handling Instructions and Additional Information TAN DECATER SLUDGE. TRUCK NO. 0100-1725 VEHICLE I.D. NO. H 1015					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.					
Printed/Typed Name JOSEPH BUCH			Signature <i>Joseph Buch</i>		Date Month Day Year 3-20-88
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>A. W. C. Sperry</i>		Date Month Day Year 3-20-88
Printed/Typed Name A. W. C. Sperry			Signature <i>Thomas E. Sperry</i>		Date Month Day Year 3-20-88
18. Transporter 2 Acknowledgement or Receipt of Materials			Signature		Date
Printed/Typed Name			Signature		Date
19. Discrepancy Indication Space					
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name Patrick			Signature <i>Patrick</i>		Date Month Day Year 05/24/88

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER 1-800-424-9807 24 HOURS PER DAY

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. MI-0007730431		Manifest No. 000000		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address BOGGS STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING DEARBORN, MICHIGAN 48121						A. State Manifest Document Number MI 0856410											
4. Generator's Phone (313) 323-1260						B. State Generator's ID											
5. Transporter 1 Company Name FORD MOTOR CO.						C. State Transporter's ID											
6. US EPA ID Number MI-000007136						D. Transporter's Phone											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address WASTE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN						G. State Facility's ID											
10. US EPA ID Number MI-04000613						H. Facility's Phone											
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers		13. Total Quantity		14. Unit		15. Waste No.		16. NH			
a. X HAZARDOUS WASTE SLEDGE, N.O.S.						1 BT		14		Y		1-007		X			
b.																	
c.																	
d.																	
17. Additional Descriptions for Materials Listed Above						18. Handling Codes for Wastes Listed Above						a/ 1					
												b/ 1					
												c/ 1					
												d/ 1					
15. Special Handling Instructions and Additional Information TAR RECLAIMER SLEDGE. TRUCK NO. 0105-1705 VEHICLE I.D. NO. N-1013																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.																	
Printed/Typed Name JOSEPH SMITH										Signature <i>[Signature]</i>				Date 8/21/86			
17. Transporter 1 Acknowledgement of Receipt of Materials										Date 8/21/86							
Printed/Typed Name [Signature]										Signature <i>[Signature]</i>				Month Day Year 8/21/86			
18. Transporter 2 Acknowledgement of Receipt of Materials										Date 8/21/86							
Printed/Typed Name [Signature]										Signature <i>[Signature]</i>				Month Day Year 8/21/86			
19. Discrepancy Indication Space																	
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																	
Printed/Typed Name Tom Patrick										Signature <i>[Signature]</i>				Date 8/21/86			

ALL SPILL - MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4700 OR OUT OF STATE AT 517-373-7800 AND THE NATIONAL RESPONSE CENTER 800-424-9002 24 HOURS PER DAY

DNR
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OF NATURAL RESOURCES

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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MID-00113031	Manifest No. 00019	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address BRIDGE STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING ROAD-ONE, MICHIGAN 48121				A. State Manifest Document Number MI 0856411		
4. Generator's Phone (313) 323-1260				B. State Generator's ID		
5. Transporter 1 Company Name FORD MOTOR CO.				C. State Transporter's ID		
6. US EPA ID Number MID-000009756				D. Transporter's Phone		
7. Transporter 2 Company Name				E. State Transporter's ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address MAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN				G. State Facility's ID		
10. US EPA ID Number MID-048030633				H. Facility's Phone		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.	16. N/H
a. X HAZARDOUS WASTE SLUDGE, N.O.S.		1	PT	24	Y	1-007
b.						
c.						
d.						
17. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
				a1		
				a2		
				a3		
				a4		
15. Special Handling Instructions and Additional Information TAR DECAPTER SLUDGE. TRUCK NO. 0103-1715 VEHICLE I.D. NO. H 1014						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.						
Printed/Typed Name JOSEPH SMITH		Signature <i>Joseph Smith</i>		Date Month Day Year 3/21/86		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Johnson</i>		Date Month Day Year 3/21/86		
Printed/Typed Name Johnson		Signature		Date Month Day Year		
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date Month Day Year		
Printed/Typed Name		Signature		Date Month Day Year		
19. Discrepancy Indication Space 873336						
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name R. K. 0115		Signature <i>R. K. 0115</i>		Date Month Day Year 3/21/86		

ATT. ☐ DIS. ☐ REJ. ☐

Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969

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Form Approved OMB No 2000-0404 Expires 7-31-86

ACCT 101



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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. MD-0000000000	Manifest Doc No. 00321	2. Page 1 of 1	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address ELITE STEEL CO. 94 MI LINE SHIPPING DEPARTMENT, MICHIGAN 48122 913 323-1260		6. State Manifest Document Number MI 0856413		7. State Generator's ID 1		
4. Generator's Phone ()		8. US EPA ID Number MD-0000000000		9. State Transporter's ID 1		
5. Transporter 1 Company Name PORE MOTOR CO.		10. US EPA ID Number		11. Transporter's Phone		
7. Transporter 2 Company Name		10. US EPA ID Number		12. State Transporter's ID		
9. Designated Facility Name and Site Address WATTS DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MD-0000000000		10. US EPA ID Number		13. State Facility's ID		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER)		12. Containers		13. Total Quantity		14. Unit
a. I HAZARDOUS WASTE SLEDGE, N.O.S.		No. 1 Type DT		14		Y
b.						
c.						
d.						
15. Additional Descriptions for Materials Listed Above		16. Handling Codes for Wastes Listed Above		17. Waste No.		18. UNH
				1		1
				2		1
				3		1
				4		1
15. Special Handling Instructions and Additional Information WATER RECYCLER SLEDGE. TRUCK NO. 0103-1715 VEHICLE I.D. NO. 2-1024						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.						
Printed/Typed Name JOSEPH SMITH		Signature <i>Joseph Smith</i>		Date 3/21/06		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Johnson</i>		Date 3/21/06		
Printed/Typed Name JOHNSON		Signature		Date		
18. Transporter 2 Acknowledgement or Receipt of Materials		Signature		Date		
Printed/Typed Name		Signature		Date		
19. Discrepancy Indication Space 8934/16						
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name <i>R. R. Smith</i>		Signature <i>R. R. Smith</i>		Date 3/21/06		

ALL SPILLAGE MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 817-373-7680 AND THE NATIONAL RESPONSE CENTER 800-424-9302 24 HOURS PER DAY

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI-007790431		Manifest No. 00322		2. Page 1 of 2		Information in the shaded areas is not required by Federal law									
3. Generator's Name and Mailing Address BOUGE STEEL CO. 3061 MILLER ROAD 94 MI LINE SHIPPING DELROSE, MICHIGAN 48121						A. State Manifest Document Number MI 0856414											
4. Generator's Phone (313) 323-1260						B. State Generator's ID											
5. Transporter 1 Company Name POED MOTOR CO.						C. State Transporter's ID											
6. US EPA ID Number MI-000809756						D. Transporter's Phone											
7. Transporter 2 Company Name						E. State Transporter's ID											
8. US EPA ID Number						F. Transporter's Phone											
9. Designated Facility Name and Site Address WATKINS DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN						G. State Facility's ID											
10. US EPA ID Number MI-043090633						H. Facility's Phone											
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)						12. Containers		13. Total Quantity		14. Unit		15. Waste No.		16. W/H			
a. X HAZARDOUS WASTE SLUDGE, H.O.S.						No. 1 Type BT		14		Y		E-007		M			
b.																	
c.																	
d.																	
17. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above						a/ 1					
						OX-2						b/ 1					
						EX-100						c/ 1					
						12						d/ 1					
15. Special Handling Instructions and Additional Information TANK DECAPTER SLUDGE. TRUCK NO. 0100-1725 VEHICLE I.D. NO. H-1015																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment TO THE BEST OF MY KNOWLEDGE & BELIEF.																	
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>						Date Month Day Year 3/23/96					
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Vincent Lemon</i>						Date Month Day Year 3/23/96					
Printed/Typed Name Vincent Lemon						Signature <i>Vincent Lemon</i>						Date Month Day Year 3/23/96					
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature						Date Month Day Year					
Printed/Typed Name						Signature						Date Month Day Year					
19. Discrepancy Indication Space 893405																	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																	
Printed/Typed Name R. T. Jones						Signature <i>R. T. Jones</i>						Date Month Day Year 3/23/96					

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7860 AND THE NATIONAL RESPONSE CENTER AT 1-800-292-4706 24 HOURS PER DAY.



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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI-00173031		Manifest No. 00323		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.											
3. Generator's Name and Mailing Address BOUCK STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING DELANDON, MICHIGAN 48123						A. State Manifest Document Number MI 0856415													
4. Generator's Phone (313) 323-1860						B. State Generator's ID													
5. Transporter 1 Company Name FORD MOTOR CO.						C. State Transporter's ID													
6. US EPA ID Number MI-000803756						D. Transporter's Phone													
7. Transporter 2 Company Name						E. State Transporter's ID													
8. US EPA ID Number						F. Transporter's Phone													
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN						G. State Facility's ID													
10. US EPA ID Number MI-04090633						H. Facility's Phone													
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers No. Type		13. Total Quantity		14. Unit M/Vol		1. Waste No. N/H							
a. I HAZARDOUS WASTE SLUDGE, H.O.S.						2 DT		34		Y		2-100							
b.																			
c.																			
d.																			
13. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above MI-2 MI-3000 MI						a/ 1		b/ 1		c/ 1		d/ 1	
15. Special Handling Instructions and Additional Information TAN DECATTER SLUDGE, TRUCK NO. 0100-1725 VEHICLE I.D. NO. H-1015																			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practica- ble and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment TO THE BEST OF MY KNOWLEDGE & BELIEF.																			
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>						Date Month Day Year 3-21-86							
17. Transporter 1 Acknowledgement of Receipt of Materials						Date Month Day Year 3-21-86													
Printed/Typed Name <i>Vertie Clemens</i>						Signature <i>Vertie Clemens</i>						Date Month Day Year 3-21-86							
18. Transporter 2 Acknowledgement of Receipt of Materials						Date Month Day Year													
Printed/Typed Name						Signature						Date Month Day Year							
19. Discrepancy Indication Space																			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																			
Printed/Typed Name <i>Tony Patrick</i>						Signature <i>Tony Patrick</i>						Date Month Day Year 3-21-86							

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 617-373-7860 AND THE NATIONAL RESPONSE
CENTER 800-424-8802 24 HOURS PER DAY

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UNIFORM HAZARDOUS
WASTE MANIFEST

Generator's US EPA ID No.

MD-00773001

Manifest
No.

00000

2. Page 1
of 1Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

BOONE STEEL CO. 3001 MILLER ROAD
94 MI LINE SHIPPING BEAUMONT, MICHIGAN 48121
913 323-1260

4. Generator's Phone ()

8. US EPA ID Number

5. Transporter 1 Company Name

MD-000009734

FORD MOTOR CO.

8. US EPA ID Number

7. Transporter 2 Company Name

10. US EPA ID Number

9. Designated Facility Name and Site Address

WAYNE DISPOSAL
49350 I-94 SERVICE DRIVE
VAN BUREN TOWNSHIP, MICHIGAN MD-000090633

1. State Manifest Document Number

MI 0856417

2. State Generator's ID

3. State Transporter's ID

4. Transporter's Phone

5. State Transporter's ID

6. Transporter's Phone

7. State Facility's ID

8. Facility's Phone

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
ID NUMBER).

12. Containers

No. Type

13. Total
Quantity14. Unit
Wt/Vol15. Waste
No.

16. HWM

1. DT 1A Y E-007 E

b.

c.

d.

e.

f.

g.

h.

i.

j.

k.

l.

m.

n.

o.

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av.

aw.

ax.

ay.

az.

Additional Descriptions for Materials Listed Above

17. Handling Codes for Wastes
Listed Above

a/ 1

b/ 1

c/ 1

d/ 1

15. Special Handling Instructions and Additional Information

TAN DECAFTER SLUDGE. TRUCK NO. 0103-1715 VEHICLE I.D. NO. E-1014

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b)
of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practica-
ble and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the
environment.

TO THE BEST OF MY KNOWLEDGE & BELIEF.

Printed/Typed Name

JOSEPH SMITH

Signature

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

R. J. Smith

Signature

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86

Date

Month Day Year

3/24/86



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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MD-057730431		Manifest Document No. 00356		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address ROUGH STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING BEARDOWN, MICHIGAN 48121						A. State Manifest Document Number MI 0856418							
4. Generator's Phone (313) 323-1260						B. State Generator's ID							
5. Transporter 1 Company Name FORD MOTOR CO.						C. State Transporter's ID							
6. US EPA ID Number MD-000009756						D. Transporter's Phone							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MD-048090633						G. State Facility's ID							
10. US EPA ID Number						H. Facility's Phone							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers No. Type		13. Total Quantity		14. Unit W/Vol		1. Waste No. N/H	
a. X HAZARDOUS WASTE SLUDGE, N.O.S.						1 1T		14		Y		E-007 H	
b.													
c.													
d.													
1. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above						a/ /	
												b/ /	
												c/ /	
												d/ /	
15. Special Handling Instructions and Additional Information TAR DECANTER SLUDGE. TRUCK NO. 0100-1725 VEHICLE I.D. NO. E-1015													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.													
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>						Date Month Day Year 3/24/86	
17. Transporter 1 Acknowledgement of Receipt of Materials												Date	
Printed/Typed Name <i>Walter Clement</i>						Signature <i>Walter Clement</i>						Month Day Year 3/24/86	
18. Transporter 2 Acknowledgement of Receipt of Materials												Date	
Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space 812503													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.												Date	
Printed/Typed Name <i>RK-Riley</i>						Signature <i>RK-Riley</i>						Month Day Year 3/24/86	

ALL SPILLAGE MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7866 AND THE NATIONAL RESPONSE CENTER 1-800-424-8802 24 HOURS PER DAY.

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MID-007735431		Manifest No. 00327		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address ROUSE STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING BEARBORN, MICHIGAN 48121						A. State Manifest Document Number MI 0856419					
4. Generator's Phone (313) 323-1260						B. State Generator's ID					
5. Transporter 1 Company Name FORD MOTOR CO.						C. State Transporter's ID					
6. US EPA ID Number MID-000009756						D. Transporter's Phone					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MID-048090633						G. State Facility's ID					
10. US EPA ID Number						H. Facility's Phone					
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM						12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	1. Waste No. N/H	
a. X HAZARDOUS WASTE SLUDGE, H.O.S.						1		BT	14	Y	X-007 H
b.											
c.											
d.											
15. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes * Listed Above RM-2 RM-3189 22				a/ 1	
										b/ 1	
										c/ 1	
										d/ 1	
16. Special Handling Instructions and Additional Information TAR DECAPTER SLUDGE. TRUCK NO. 8105-1705 VEHICLE I.D. NO. H-1013											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.											
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>				Date Month Day Year 3/24/86	
17. Transporter 1 Acknowledgement of Receipt of Materials										Date	
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>				Month Day Year 3/24/86	
18. Transporter 2 Acknowledgement or Receipt of Materials										Date	
Printed/Typed Name						Signature				Month Day Year	
19. Discrepancy Indication Space 873-21											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.											
Printed/Typed Name R. F. Smith						Signature <i>R. F. Smith</i>				Date Month Day Year 3/24/86	

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4708 OR OUT OF STATE AT 617-373-7860 AND THE NATIONAL RESPONSE CENTER 1-800-424-8802 24 HOURS PER DAY.



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Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI-007730431		Manifest No. 00385		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address BUCK STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING MARSHALL, MICHIGAN 49121						A. State Manifest Document Number MI 0856420				
4. Generator's Phone (513) 323-1260						B. State Generator's ID				
5. Transporter 1 Company Name FORD MOTOR CO.						C. State Transporter's ID				
6. US EPA ID Number MI-000809756						D. Transporter's Phone				
7. Transporter 2 Company Name						E. State Transporter's ID				
8. US EPA ID Number						F. Transporter's Phone				
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN						G. State Facility's ID				
10. US EPA ID Number MI-048990633						H. Facility's Phone				
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM)						12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	J. H/H
a. X HAZARDOUS WASTE SUDGE, H.O.S.						1	BT	14	Y	E-007 H
b.										
c.										
d.										
Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above				
						U1				
						U2				
						U3				
						U4				
15. Special Handling Instructions and Additional Information TAN RECAPTER SUDGE. TRUCK NO. 0103-1715 VEHICLE I.D. NO. H-1014										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.										
Printed/Typed Name JOSEPH SMITH						Signature <i>Joseph Smith</i>		Date 3/24/86		
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>Fox</i>		Date 3/24/86		
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Date		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest, except as noted in item 19.										
Printed/Typed Name <i>Tommy Kitch</i>						Signature <i>Tommy Kitch</i>		Date 3/24/86		

ALL SPILLAGE MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4708 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER 800-424-9302 24 HOURS PER DAY.



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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MD-087730431	Manifest No. 00389	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address ROCKE STEEL CO. 3001 MILLER ROAD 94 MI LINE SHIPPING ROAD, MICHIGAN 48161		4. State Manifest Document Number MI 0856421			5. State Generator's ID	
4. Generator's Phone 313 323-1260		6. US EPA ID Number MD-000809756			7. State Transporter's ID	
5. Transporter 1 Company Name FORD MOTOR CO.		8. US EPA ID Number			9. Transporter's Phone	
7. Transporter 2 Company Name		10. US EPA ID Number			11. State Transporter's ID	
9. Designated Facility Name and Site Address WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN MD-043090633		12. US EPA ID Number			13. State Facility's ID	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	15. Waste No. N/H
a. X HAZARDOUS WASTE SLUDGE, H.O.B.		1 BT		14	Y	E-087 H
b.						
c.						
d.						
16. Additional Descriptions for Materials Listed Above		17. Handling Codes for Wastes Listed Above		a/ J b/ 1 c/ 1 d/ 1		
15. Special Handling Instructions and Additional Information TAR DECATTER SLUDGE. TRUCK NO. 0100-1725 VEHICLE I.D. NO. H-1015						
16. GENERATOR'S CERTIFICATION. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. TO THE BEST OF MY KNOWLEDGE & BELIEF.						
Printed/Typed Name JOSEPH SMITH		Signature <i>Joseph Smith</i>		Date Month Day Year 3/24/86		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Vernon Clement</i>		Date Month Day Year 3/24/86		
Printed/Typed Name Vernon Clement		Signature <i>Vernon Clement</i>		Date Month Day Year 3/24/86		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date Month Day Year		
Printed/Typed Name		Signature		Date Month Day Year		
19. Discrepancy Indication Space 80055						
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name RTURNS		Signature <i>RTURNS</i>		Date Month Day Year 3/24/86		

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-252-4706 OR OUT OF STATE AT 817-373-7880 AND THE NATIONAL RESPONSE CENTER 1-800-424-9302 24 HOURS PER DAY.



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Dearborn, Michigan 48267Invoice No. RS- **258215**

Date issued 3/24/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Def. mat.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value		
Type of shipment											Initials and car number			Gross weight			
Sold to											Length of car		Containers		Tare weight		
											Ordered	Furnished			Net weight		
											Seals		Account distribution				
Ship to (If other than sold to) WATL DISPOSAL 49250 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																	
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference				
Requested by PILZNER		Phone 97745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.	
Quantity Ordered	Part Number-Code-Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount				
1	T/L TAR DECANter SLUDGE, N.O.S.										1						
	1159																
	8																
Authorization to release (Signature)											Badge No.		Date shipped 3/24/86				
Truck name and no. 0193-1715				Carrier's Signature <i>[Signature]</i>				B/L or W/B number				RS 258215					
Received by				Received from (Carrier)				Date received									



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Toit, Michigan 48267

Invoice No. RS- **258216**

Date issued 3/24/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Det. mat.	Misc.	How shipped (Route) FORD 60000 TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value		
Type of shipment											Initials and car number			Gross weight			
Sold to											Length of car		Containers		Tare weight		
											Ordered	Furnished			Net weight		
											Seals						
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN											Account distribution						
Date to ship	Customer order or auth. no. 94-319307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference				
Requested by PILZNER	Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.		
Quantity Ordered	Part Number—Code—Description				Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price		Amount				
1	T/L TAR DECANter SLUDGE, N.O.S.									1							
1159																	
80																	
Authorization to release (Signature) 											Badge No.		Date shipped 3/24/86			RS 258216	
Truck name and no. 0100-3785											Carrier's Signature 		B/L or W/B number				
Received by					Received from (Carrier)					Date received							



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:

P.O. Box 67-239A

Detroit, Michigan 48267

Invoice No. RS-258217

Date issued 3/24/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Sevage	Def. matl.	Misc.	How shipped (Route) SEMI FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value		
Type of shipment											Initials and car number		Gross weight				
Sold to											Length of car		Containers		Tare weight		
											Ordered	Furnished			Net weight		
											Seals		Account distribution				
Ship to (If other than sold to) WAYNE DISPOSAL 43350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																	
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON					Terms	F.O.B.	Invoice reference					
Requested by PILENER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material	Rec. report no.		Rec. report date		Insp. report no.		
Quantity Ordered	Part Number—Code—Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount				
1	T/L TAR DECANter SLUDGE, H.O.S.										1						
1159																	
8																	
Authorization to release (Signature)											Badge No.		Date shipped 3/24/86				
Truck name and no. 0105-1705											Carrier's Signature		B/L or W/B number			RS 258217	
Received by						Received from (Carrier)					Date received						



Invoice/Ship

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P Box 67-239A
D Detroit, Michigan 48267

Invoice No. RS- **258218**

Date issued 3/24/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Def. mat.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Prod.	Parcel post	Insurance value
Type of shipment										Initials and car number				Gross weight	
Sold to										Length of car		Containers		Tare weight	
										Ordered	Furnished				
										Seals				Net weight	
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN										Account distribution					
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference		
Requested by FILENER		Phone 47745		Dist. code		Stock location COIL OVERS		Building code		Rejected material		Rec. report no.		Rec. report date Insp. report no.	
Quantity Ordered	Part Number—Code—Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price		Amount	
1	T/L TAR DECANTER SLEDGE, H.O.S.										1				
1159															
8															
Authorization to release (Signature) 										Badge No.		Date shipped 3/24/86			
Truck name and no. 8103-1715					Carrier's Signature 					S/L or W/B number			RS 258218		
Received by					Received from (Carrier)					Date received					



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:

P.O. Box 67-239A

Detroit, Michigan 48267

Invoice No. RS- **258219**

Date issued 3/24/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Defect	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value			
Type of shipment											Initials and car number			Gross weight				
Sold to											Length of car		Containers		Tare weight			
											Ordered	Furnished			Net weight			
											Seals		Account distribution					
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																		
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference					
Requested by PILZNER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.		
Quantity Ordered	Part Number—Code—Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount					
1	T/L TAR DECANter SLUDGE, M.O.S.										1							
<div>1159</div> <div>8</div>																		
Authorization to release (Signature) <i>[Signature]</i>											Badge No.		Date shipped 3/24/86					
Truck name and no. 0100-1725											Carrier's Signature <i>[Signature]</i>		B/L or W/B number				RS 258219	
Received by					Received from (Carrier)					Date received								

Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Detroit, Michigan 48267

Invoice No. RS- **258205**

Date issued 3/21/86									Prod.		Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Seize	Defect	Misc.	How shipped (Route) FORD TRUCK			Exp.	Coll.	Ppd.	Parcel post	Insurance value
Type of shipment																	Initials and car number					Gross weight				
Sold to																	Length of car		Containers		Tare weight					
																	Ordered	Furnished								
																	Seals				Net weight					
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																	Account distribution									
Date to ship		Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference												
Requested by FILENER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.										
Quantity Ordered	Part Number—Code—Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price		Amount												
1	T/L TAR DECANter SLUDGE, N.O.S.					1159			8		1															
Authorization to release (Signature)										Badge No.		Date shipped 3/21/86					RS 258205									
Truck name and no. 0103-1715										Carrier's Signature		B/L or W/B number														
Received by										Received from (Carrier)					Date received											



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Dearborn, Michigan 48267

Invoice No. RS- **258204**

Date issued 3/21/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed assem.	Scrap	Salvage	Def. matl.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value	
Type of shipment											Initials and car number			Gross weight		
Sold to											Length of car		Containers		Tare weight	
											Ordered	Furnished			Net weight	
											Seals		Account distribution			
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference			
Requested by FILZNER	Phone 47745	Dist. code	Stock location COKE OVERS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.			
Quantity Ordered	Part Number—Code—Description				Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount				
1	T/L TAR DECANTER SLUDGE, N.O.S.									1						
<div>1159</div> <div>8</div>																
Authorization to release (Signature)											Badge No.		Date shipped 3/21/86			
Truck name and no. 6105-1705				Carrier's Signature				B/L or W/B number					RS 258204			
Received by				Received from (Carrier)				Date received								



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Dearborn, Michigan 48267

Invoice No. RS- **258208**

Date issued 3/21/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Lease	Def. matl.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Fpd.	Parcel post	Insurance value		
Type of shipment										Initials and car number			Gross weight				
Sold to										Length of car		Containers		Tare weight			
										Ordered	Furnished			Net weight			
										Seals		Account distribution					
Ship to (If other than sold to) WAYNE DISPOSAL 43350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																	
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference				
Requested by PILZNER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.	
Quantity Ordered	Part Number-Code-Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount				
1	T/L TAR DECANter SLUDGE, N.O.S.										1						
<div>1159</div> <div>8</div>																	
Authorization to release (Signature) 										Bridge No.		Date shipped 3-21-86		RS 258208			
Truck name and no. 0110-1725					Carrier's Signature			B/L or W/B number									
Received by					Received from (Carrier)			Date received									



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Detroit, Michigan 48267

Invoice No. RS- **258210**

3/21/86	Issued	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Seize	Del mat	Misc.	How shipped (Route)	Exp.	Coll.	Ppd.	Parcel post	Insurance value				
											FORD TRUCK									
Type of shipment											Initials and car number				Gross weight					
Sold to											Length of car		Containers		Tare weight					
											Ordered	Furnished			Net weight					
											Seals		Account distribution							
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																				
Date to ship		Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference						
Requested by PILZNER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.				
Quantity Ordered		Part Number-Code-Description				Checker's Number and Shipping Information				Weight		Traffic Code		Quantity Shipped		Unit Price		Amount		
1		T/L TAR DECANTER SLUDGE, N.O.S.												1						
		1159								8										
Authorization to release (Signature)											Badge No.		Date shipped 3-21-86				RS 258210			
Truck name and no. 0100-1735											Carrier's Signature		B/L or W/B number							
Received by											Received from (Carrier)				Date received					



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Detroit, Michigan 48267

Invoice No. RS- **258207**

Date issued 3/21/86	Prod.	Serv.	Non-prod	Consign-ment	Fixed asset	Scrap	Salvage	Def. matl	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value	
Type of shipment											Initials and car number			Gross weight		
Sold to											Length of car Ordered Furnished		Containers	Tare weight		
											Seals			Net weight		
											Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN					
Date to ship	Customer order or auth. no. 94-319307				Issued by HOUSTON			Terms		F.O.B.	Invoice reference					
Requested by FILENLE	Phone 47745	Dist. code	Stock location COKE OVENS		Building code		Rejected material	Rec. report no.	Rec. report date	Insp. report no.						
Quantity Ordered	Part Number—Code—Description				Checker's Number and Shipping Information		Weight	Traffic Code	Quantity Shipped	Unit Price	Amount					
1	T/L TAR DECANTER SLUDGE, N.O.S.								1							
	1159															
							8									
Authorization to release (Signature)											Badge No.		Date shipped 3/21/86			RS 258207
Truck name and no. 8183-JY15				Carrier's Signature				B/L or W/B number								
Received by				Received from (Carrier)				Date received								



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Dearborn, Michigan 48267

Invoice No. RS- **258206**

Date issued 3/21/86	Prod.	Serv.	Non-prod.	Consignment	Fixed asset	Scrap	Salvage	Def. matl.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value	
Type of shipment											Initials and car number			Gross weight		
Sold to											Length of car		Containers	Tare weight		
											Ordered	Furnished		Net weight		
											Seals		Account distribution			
Ship to (If other than sold to) WAYNE DISPOSAL 43350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON		Terms		F.O.B.		Invoice reference					
Requested by PILZNER	Phone 47745	Dist. code	Stock location COKE OVENS		Building code		Rejected material	Rec. report no.	Rec. report date	Insp. report no.						
Quantity Ordered	Part Number—Code—Description				Checker's Number and Shipping Information		Weight	Traffic Code	Quantity Shipped	Unit Price	Amount					
1	T/L TAE DECANter SLUDGE, N.O.S.				1159		8		1							
Authorization to release (Signature) _____											Badge No.		Date shipped 3/21/86			
Truck name and no. 8205-1705					Carrier's Signature			B/L or W/B number			RS 258206					
Received by					Received from (Carrier)				Date received							



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Detroit, Michigan 48267

Invoice No. RS-258201

3/20/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Def. matl.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value			
Type of shipment											Initials and car number			Gross weight				
Sold to											Length of car		Containers	Tare weight				
											Ordered	Furnished		Net weight				
											Seals		Account distribution					
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																		
Date to ship		Customer order or auth. no. 94-919307			Issued by HOUSTON			Terms		F.O.B.		Invoice reference						
Requested by PILNER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date		Insp. report no.		
Quantity Ordered		Part Number—Code—Description				Checker's Number and Shipping Information			Weight		Traffic Code		Quantity Shipped		Unit Price		Amount	
1		T/L TAR DECANTER SLUDGE, N.O.S.											1					
		1159																
									8									
Authorization to release (Signature)											Badge No.		Date shipped					
Truck name and no. 011117											Carrier's Signature		B/L or W/B number					
Received by											Received from (Carrier)				Date received			

RS 258201



Invoice/Ship r

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Wire remittances to:
Box 67-239A
Detroit, Michigan 48267Invoice No. RS- **258200**

Date issued 3/20/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Def. mat.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value		
Type of shipment											Initials and car number			Gross weight			
Sold to											Length of car		Containers	Tare weight			
											Ordered	Furnished		Net weight			
											Seals		Account distribution				
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN																	
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON			Terms		F.O.B.	Invoice reference						
Requested by PILZNER	Phone 47745		Dist. code		Stock location COKE OVENS			Building code		Rejected material	Rec. report no.		Rec. report date		Insp. report no.		
Quantity Ordered	Part Number—Code—Description				Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price		Amount				
1	T/L TAR DECANTEE SLUDGE, N.O.S.									1							
	1159																
								8									
Authorization to release (Signature)											Badge No.		Date shipped				
Truck name and no.											Carrier's Signature		B/L or W/B number				
Received by											Received from (Carrier)			Date received			

RS **258200**



Invoice/Shipper

Rouge Steel Company

P.O. Box 1639

Dearborn, Michigan 48121

Location Code-4501

Make remittances to:
P.O. Box 67-239A
Detroit, Michigan 48267

Invoice No. RS- **258197**

Date issued 3/20/86	Prod.	Serv.	Non-prod.	Consign-ment	Fixed asset	Scrap	Salvage	Def. matl.	Misc.	How shipped (Route) FORD TRUCK	Exp.	Coll.	Ppd.	Parcel post	Insurance value
Type of shipment										Initials and car number				Gross weight	
Sold to										Length of car		Containers		Tare weight	
										Ordered	Furnished			Net weight	
										Seals		Account distribution			
Ship to (If other than sold to) WAYNE DISPOSAL 49350 I-94 SERVICE DRIVE VAN BUREN TOWNSHIP, MICHIGAN															
Date to ship	Customer order or auth. no. 94-919307				Issued by HOUSTON				Terms		F.O.B.		Invoice reference		
Requested by PILZNER		Phone 47745		Dist. code		Stock location COKE OVENS		Building code		Rejected material		Rec. report no.		Rec. report date Insp. report no.	
Quantity Ordered	Part Number—Code—Description					Checker's Number and Shipping Information			Weight	Traffic Code	Quantity Shipped	Unit Price	Amount		
1	T/L TAR DECANter SLUDGE, N.O.S.										1				
	1159														
	8														
Authorization to release (Signature)										Badge No.		Date shipped 3/20/86			
Truck name and no. 6100-1725										Carrier's Signature		B/L or W/B number			
Received by										Received from (Carrier)		Date received			

RS **258197**

Previous P. N. Number (s) <i>6-1099H</i>		Specifying Department Approval <i>SD</i>		Using Department Approval <i>25 8400</i> <i>SD</i>		Serial Number 533443	
Suggested Vendor <i>BURMAN ANAL. DIV.</i> <i>408 AUBURN AV.</i> <i>NTIAC 48057</i>		Shipper Number SD-				Date Issued <i>4/25/86</i>	

Expedite Information				Date Required <i>12/30/86</i>			
Ship To Attention Of <i>G. WAGGONER</i>		Address Inquiries To Name <i>G. WAGGONER</i>		Phone <i>32-31260</i>		Location <i>(R08) 4504</i>	
				Specifying Dept. <i>ENV1</i> <i>ENB. 8400</i>			
Expedite Instructions						Type Of Order Normal _____ Emergency _____	

Ship To Code <i>07</i>	Project No.	Work Order Number (s)					Analyst Code <i>08</i>
		1	2	3	4	5	

P. N. Number <i>859136</i>	Order Quan. <i>1</i>	Unit Meas. <i>SK</i>	Ford Code Or Item No. <i>01</i>	Ford Std.	Ford Blue Print	Ford Detail/Pattern	Pat. Req.	Est. Total Value <i>\$7150</i>
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Item Description <i>PERFORM LABORATORY ANALYSES TO DETERMINE CYANIDES, PHENOL, SULFIDES, AND NAPHTHALENE IN FIVE SAMPLES (FILTER BAG, DIATOMACEOUS EARTH FILTER MEDIUM, TRENCH LIQUOR, AND TRENCH SLUDGE), AND TO DETERMINE THE TO LIQUID IN TRENCH LIQUOR AND TRENCH SLUDGE</i>								
---	--	--	--	--	--	--	--	--

Special Shipping Instructions To Vendor					Vendor No.	Blanket No.	Date Confirmed
---	--	--	--	--	------------	-------------	----------------

P. N. Number	Order Quan.	Unit Meas.	Ford Code Or Item No.	Ford Std.	Ford Blue Print	Ford Detail/Pattern	Pat. Req.	Est. Total Value
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Item Description								
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Special Shipping Instructions To Vendor					Vendor No.	Blanket No.	Date Confirmed
---	--	--	--	--	------------	-------------	----------------

Account Classification					A P P R O V A L	Remarks To Procurement Control - Explain Reason For Single Source Or Emergency Handling	
#	Gen.	Acct.	Using Dept.	%		Procurement Control Remarks To Purchasing	
1	<i>12</i>	<i>976-4</i>	<i>8400</i>				
	*						
3	*						
4	*						
5	*						

COMPLAINANT'S EXHIBIT 19



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

JUL 2 2 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sidney Kelly
Registered Agent for
Rouge Steel Company
Subsidiary of
Ford Motor Company
The American Road
Dearborn, Michigan 48121

Re: Complaint, Findings
of Violation and Compliance Order
EPA I.D. No: MID 087 738 431

Dear Mr. Kelly:

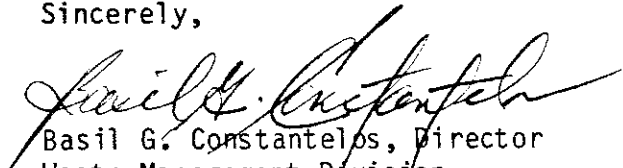
Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Rouge Steel Company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on inspections conducted by the Michigan Department of Natural Resources and other information obtained from our files regarding your facility located at 3001 Miller Road, Dearborn, Michigan. The findings in the Complaint state the reasons for such a determination. In essence, the facility violated regulations applicable to generators and owners and operators of hazardous waste treatment, storage and disposal facilities.

Accompanying the Complaint is a Notice of Opportunity for Hearing and a copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation or Suspension of Permits". Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk (5MF-14) at the United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from receipt of this Complaint. A copy of your request should also be sent to Roger Grimes, Office of Regional Counsel (5C-16) at the same address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions, or desire to request an informal conference for the purpose of settlement, please contact Laura Lodisio, Hazardous Waste Enforcement Branch, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604. Ms. Lodisio may be reached at (312) 886-7090.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Del Rector, Chief
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Mr. Benedict Okwumabua
MDNR - Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

Mr. P.T. Sullivan
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

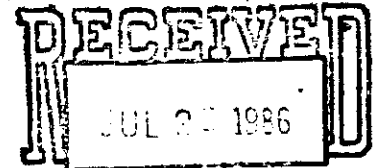
IN THE MATTER OF)
)
ROUGE STEEL COMPANY)
3001 MILLER ROAD)
DEARBORN, MICHIGAN 49504)
)
EPA I.D. No: MID 087 738 431)

DOCKET NO.

COMPLAINT, FINDINGS
OF VIOLATION AND COMPLIANCE ORDER

V-W- 88 R-61

COMPLAINT



This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA or the Act), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Rouge Steel Company, 3001 Miller Road, Dearborn, Michigan.

This Complaint is based on inspections conducted by the Michigan Department of Natural Resources (MDNR), as an authorized representative of the U.S. EPA, and the other information contained in U.S. EPA files concerning this facility.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information above, it has been determined that Respondent is in violation of 42 U.S.C. Sections 6922, 6924, and 6925, and regulations promulgated thereunder, in that Respondent has failed to comply with certain standards applicable to generators and owners and operators of hazardous waste treatment, storage and disposal

facilities. Specifically, Respondent has been determined to be in violation of regulations 40 CFR 262.34, 262.40, 265 Subparts A, B, C, D, E, F, G, H, K and Q and Part 270.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), and §6928 respectively.

FINDINGS AND DETERMINATIONS

This determination of violation is based on the following:

1. Respondent, Rouge Steel Company, is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15) who owns and operates a facility located at 3001 Miller Road, Dearborn, Michigan 48121 that generates, treats and disposes of hazardous waste. The Respondent is a wholly owned subsidiary of Ford Motor Company, a Michigan Corporation whose registered agent is Mr. Sidney Kelly, The American Road, Dearborn, Michigan.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste or owns or operates a facility for the treatment, storage or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 also provides that no hazardous waste subject to regulation may be transported, treated, stored, or disposed of unless the required notification has been given.
3. U.S. EPA first published regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980.

These regulations are codified at 40 CFR Parts 260 through 265.

Notification to U.S. EPA of hazardous waste handling was required in most instances no later than August 18, 1980.

4. On August 11, 1980, Respondent submitted to U.S. EPA a Notification of Hazardous Waste Activity indicating that the facility generates, treats, stores, or disposes of U.S. EPA hazardous wastes Nos. F001, F016, K060, K061, K062, K087, U002, U226, D001 (Ignitable), D003 (Reactive) and D000 (Toxic). The name of the installation stated on the Notification was Ford Motor Company - Steel Division. On March 24, 1982, Respondent submitted a letter to U.S. EPA stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, a wholly owned subsidiary.
5. Section 3005(a) of RCRA, 42 U.S.C. §6925, requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.
6. Regulation 40 CFR 270.10(e) requires owners and operators of existing hazardous waste management facilities to submit Part A of their RCRA permit application to the Regional Administrator no later than (i) 6 months after the date of the publication of regulations which first require them to comply with the standards set forth in 40 CFR Parts

265 or 266, or (ii) thirty days after the date they first become subject to the standards set forth in 40 CFR Parts 265 or 266, whichever occurs first.

7. Section 3005(e) of RCRA, 42 U.S.C. §6925(e), provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application provided that: (1) the facility was in existence on November 19, 1980, (2) the requirements of Section 3010(a) of RCRA concerning the notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.
8. On November 17, 1980, Respondent submitted to U.S. EPA Part A of their RCRA permit application for disposal of hazardous waste in underground injection wells. The waste type included in the Part A was identified as EPA Hazardous Waste No. D003. On March 26, 1982, Respondent submitted a revised Part A General Information form stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, and that all other information remained the same.
9. As defined in 40 CFR 260.10 "treatment" means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous,

or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

10. As defined in 40 CFR 260.10 "surface impoundment" or "impoundment" means a facility or part of a facility which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.
11. On March 14, 1986, a RCRA compliance inspection was conducted by the Michigan Department of Natural Resources (MDNR) as an authorized representative of the U.S. EPA. At the time of this inspection it was determined that a hazardous waste management unit at Respondent's facility is a man-made diked excavation which was designed to hold an accumulation of wastes containing free liquids. Specifically, the surface impoundment is used to treat, by solidification, decanter tar sludge from coking operations (U.S. EPA hazardous waste No. K087).
12. At the time of the RCRA compliance inspection on March 14, 1986, it was further determined that Respondent treats by filtration, hazardous waste identified as EPA Hazardous Waste No. D003 prior to disposal in an underground injection well.
13. Based on Findings 9 through 12 above, U.S. EPA has determined that Respondent owns and operates a surface impoundment for the treatment of hazardous wastes and conducts other hazardous waste treatment and is, therefore, subject to all applicable requirements of 40 CFR Part 265,

Subparts A, B, C, D, E, F, G, H, K and Q and the permit requirements of 40 CFR Part 270.

14. Pursuant to requirements of the Hazardous and Solid Waste Amendments of 1984, Section 213, 40 CFR 270.73(c), if granted interim status under Section 3005 of RCRA, a facility must submit a completed Part B permit application and certification of compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, to avoid losing interim status on all surface impoundments. If a Part B permit application and certification of compliance is not received by November 8, 1985, the owner or operator must submit a closure plan, stating his intent to close the facility, to the Regional Administrator no later than 15 days after termination of interim status as required by 40 CFR 265.112(c).
15. On November 4, 1985, U.S. EPA received a letter from Respondent certifying that the No. 2 deep well at the facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements of RCRA.
16. Based on information in the U.S. EPA files, as of November 8, 1985, Respondent failed to submit Part B of the permit application and certify compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, as required by Section 3005(e) of RCRA for the hazardous waste surface impoundment. RCRA regulated land disposal units that fail to meet the requirements of Section 3005(e) lose interim status and must immediately cease operation and comply with applicable closure requirements.

17. In a letter dated January 23, 1985, MDNR, as a representative of the U.S. EPA, requested that Respondent submit facility closure and post-closure plans for review. The purpose of this review was to evaluate compliance of the plans with 40 CFR 265 Subpart G. No closure plan was submitted from Respondent in response to this MDNR request.
18. In a letter dated March 29, 1985, U.S. EPA requested that the Respondent provide the agency with a copy of their closure plan because they had failed to submit it to MDNR. In response to this request, Respondent indicated that the facility only disposes of hazardous waste via underground injection and therefore was excluded from the closure requirements of 40 CFR 265 Subpart G.
19. Based on Finding 18 above, U.S. EPA determined that Respondent's facility was subject to the requirements of 40 CFR 265 Subpart R which provides that the owner/operator of a facility which only disposes of hazardous waste by underground injection is not subject to the requirements of 40 CFR Subpart G. This was acknowledged in a letter from U.S. EPA to Respondent dated April 22, 1985.
20. On March 14, 1986, the Michigan Department of Natural Resources conducted a RCRA inspection of Respondent's facility and observed the following additional violations:
 - a) The provisions of 40 CFR 265.13 require that before an owner or operator treats, stores or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all information which must be known to treat, store,

or dispose of the waste in accordance with the requirements of 40 CFR Part 265. At the time of the MDNR inspection on March 14, 1986, Respondent could not document that waste analysis had been obtained on all wastes which were generated at the facility. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

- b) The provisions of 40 CFR 262.34(a) and 265.14(c) require that signs with specific labelling or legends must be posted to each entrance to the active portions of a treatment, storage and disposal facility and at other locations, in sufficient numbers to be seen from any approach to the active portion as well as on storage tanks and containers of generated hazardous waste. At the time of the MDNR inspection on March 14, 1986, appropriate "Danger" and "Hazardous Waste" signs were not posted at some of the hazardous waste treatment and storage areas.
- c) The provisions of 40 CFR 265.31 require that facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. At the time of the MDNR inspection on March 14, 1986, hazardous waste (tar decanter sludge; EPA hazardous waste No. K087) was observed to be spilled on the ground without remedial action to correct the violation. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

d) The provisions of 40 CFR 265.16(d) require that the owner or operator must maintain personnel training documents and records at the facility. At the time of the MDNR inspection on October 17, 1985, Respondent could not produce adequate records of training. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

21. The violations cited in Finding 20, above were documented in a letter from MDNR to Respondent on April 15, 1986.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall immediately upon this Order becoming final cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste generators and the standards for treatment, storage, and disposal facilities except as provided for in Paragraphs B through E below.

B. Within 15 days of this Order becoming final, Respondent shall submit a closure plan to the Regional Administrator of the U.S. EPA, stating intent to close the surface impoundment. The closure plan shall meet all the requirements of 40 CFR 265 Subpart G, 40 CFR 265.228, and the permit requirements of 40 CFR 270.1(c). The closure plan must also provide for compliance with the requirements of 40 CFR 265 Subpart F, Groundwater Monitoring.

C. Within 15 days of this Order becoming final, Respondent shall submit to U.S. EPA a revised Part A application for a RCRA permit for treatment and disposal of hazardous waste in accordance with 40 CFR Part 270. Respondent's Part A application, when received, shall be accepted as if timely filed.

D. Within 30 days of this Order becoming final, Respondent shall comply with all applicable requirements of 40 CFR 265 Subparts A, B, C, D, E, G, H and Q regarding the treatment of reactive hazardous waste (U.S. EPA Waste No. D003).

E. Within 30 days of this Order becoming final Respondent shall provide U.S. EPA with the following:

- 1) Documentation that waste analysis has been obtained on all solid wastes generated at the facility pursuant to the requirements of 40 CFR 265.13.
- 2) Documentation that the appropriate signs have been posted at all hazardous waste treatment and storage areas pursuant to the requirements of 40 CFR 262.34 (a)(3) and 265.14(c).
- 3) Documentation that the facility is maintained and operated to minimize the possibility of a fire, explosion or any sudden or non-sudden release of hazardous waste or waste constituents to air, soil or surface water which could threaten human health and environment and that remedial action has been taken to clean up all spills of hazardous waste pursuant to 40 CFR 265.31.
- 4) Copies of personnel training records which document compliance to the requirements of 40 CFR 265.16(d).

F. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Laura Lodisio, RCRA Enforcement Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to:

Mr. Benedict Okwumabua
Michigan Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of THIRTY-SIX THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS (\$36,750) against the Respondent, Rouge Steel Company, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the

payment shall be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator you must file a written Answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your Answer and any subsequent documents filed in this action should be sent to Roger Grimes, Assistant Regional Counsel, at the same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your Answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said Answer should contain: (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

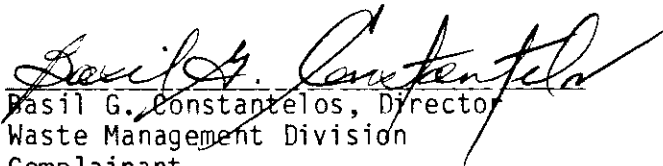
The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Ms. Laura Lodisio, RCRA Enforcement Section (5HE-12), at the address cited above, or by calling her at (312) 886-7090.

Dated this 21st day of July, 1986.


Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Mr. Sidney Kelly
Registered Agent for
Rouge Steel Company
Subsidiary of
Ford Motor Company
The American Road
Dearborn, MI 48121

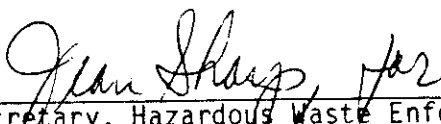
and

P.T. Sullivan, President
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, MI 48121

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, at 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this 22 day of July, 1986.



Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

COMPLAINANT'S EXHIBIT 20

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY
 Regulation Violated: Treatment of Hazardous Waste w/o Int. Status or permit.
 Assessments for each violation should be determined on separate worksheets and totalled

Part I - Seriousness of Violation Penalty

1. Potential for Harm: MINOR
2. Extent of Deviation: MAJOR
3. Matrix Cell Range: _____
 Penalty Amount Chosen: 2250
 Justification for Penalty Amount Chosen: mid-range
4. Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | <u>Percentage Change</u> | <u>Dollar Amount</u> |
|---|--------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>2250</u> |

It was determined that the facility is treating hazardous ~~active~~ ^{inactive} waste prior to its discharge to an underground injection well. Treatment consists of filtering the ~~haz~~ waste through a series of cartridge filters prior to injection. Company never notified, nor submitted a Part A permit app. for this treatment. In fact, in a number of correspondences w/ MDNR & U.S.EPA Co. indicated that no treatment was taking place on site.

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY

Regulation Violated: TSD Standards - 40 CFR 265 Subparts A, B, C, D, E, F, G, H & Q

Assessments for each violation should be determined on separate worksheets and totalled. for surface imp. & treatment in filters.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: MODERATE
2. Extent of Deviation: MAJOR
3. Matrix Cell Range: 9500
- Penalty Amount Chosen: 9500
- Justification for Penalty Amount Chosen: mid-range
4. Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | <u>Percentage Change</u> | <u>Dollar Amount</u> |
|---|--------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>9500</u> |

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

Company has never made any attempt to comply with the operating and management standards for TSD's regarding the management of both the surface impoundment and the treatment units. They did not incorporate these units in any plans; (i.e. - contingency, waste analysis, personnel training) did not conduct inspections, have proper emergency response procedures etc., and closure plans have not been developed for these areas. Because the surf. impoundment is a land disposal unit the risk of harm increases for likelihood of a release to the environment.

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY
 Regulation Violated: 262.34(a)(3) & 265.14(a) Appropriate signs not posted.
 Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

- Potential for Harm: MODERATE
- Extent of Deviation: MINOR
- Matrix Cell Range: _____
 Penalty Amount Chosen: 4000
 Justification for Penalty Amount Chosen: _____
- Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | Percentage Change | Dollar Amount |
|---|-------------------|---------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>4000</u> |

There were several hazardous waste storage/accumulation areas where the required "Danger" and "Hazardous Waste" signs were not displayed.

These areas include - 1) electric arc furnace sty. silo, 2) Old tar decanter which is still in service. 3) gas line drip tanks. 4) light oil muck tanks.

The elec. arc dust sty. area was observed to have had a sign which had fallen off, the decanter was under construction and signs had been removed, the gas linedrip tank signs were not visible. This lack of labelling & warning poses significant risk of release & harm to

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY

Regulation Violated: 265.13 - Failure to conduct sediment waste analysis
 Assessments for each violation should be determined on separate worksheets and totalled. on all solid waste.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: MODERATE
2. Extent of Deviation: MINOR
3. Matrix Cell Range: _____
 Penalty Amount Chosen: 4000
 Justification for Penalty Amount Chosen: mid-range
4. Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | <u>Percentage Change</u> | <u>Dollar Amount</u> |
|---|--------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>4000</u> |

At the time of inspection there were several solid waste streams for which there had been no evaluation. These included cartridge filters which were used for treatment of hvy. waste and several containers of mineral spirits and waste oil, which were labeled "SCRAP." By not making the determination on whether these wastes are hazardous, the company may be violating proper management & disposal requirements (i.e. - they are currently disposing of filters as non-hazardous waste.) Co. indicated at time of insp. that these went out w/ other non-haz. solid waste.

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY

Regulation Violated: 265.16(d) Lack of adequate personnel training records.
 Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: MINOR
2. Extent of Deviation: MODERATE
3. Matrix Cell Range: _____
 Penalty Amount Chosen: 1000
 Justification for Penalty Amount Chosen: mid-range
4. Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | <u>Percentage Change</u> | <u>Dollar Amount</u> |
|---|--------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: _____ | _____ | _____ |
| 2. Degree of willfulness and/or diligence: _____ | _____ | _____ |
| 3. History of Noncompliance: _____ | _____ | _____ |
| 4. Other Unique Factors: _____ | _____ | _____ |
| 5. Justification for Adjustments: _____ | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): _____ | _____ | _____ |
| 7. Number of Days of Violation: _____ | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): _____ | _____ | _____ |
| 9. Economic Benefit of Noncompliance: _____
Justification: _____ | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): _____ | _____ | _____ |
| 11. Ability to Pay Adjustment: _____
Justification for Adjustment: _____ | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): _____ | _____ | <u>1000</u> |

The personnel training records reviewed in previous (Oct. '84) inspection the facility was cited for inadequate training records, which they indicated would be revised upon current revision of the Contingency Plan. This inspection revealed, however, that the records had not been expanded to include all necessary information. Specifically, the training did not consist of hazards of the material & proper everyday handling procedures & contingency plan review.

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY

Regulation Violated: 265.31 - Spills of haz. waste; no remedial action taken

Assessments for each violation should be determined on separate worksheets and totalled.

Part I - Seriousness of Violation Penalty

- Potential for Harm: MODERATE
- Extent of Deviation: MODERATE
- Matrix Cell Range: _____
Penalty Amount Chosen: 6500
- Justification for Penalty Amount Chosen: _____
- Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | Percentage Change | Dollar Amount |
|---|-------------------|---------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>6500</u> |

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

During the inspection the tar decanter sludge container was overflowing with a significant amount of sludge spilled onto the ground. No remedial action had been taken to correct the violation and sludge was continuing to be discharged into the container. Co. indicated that the container had not been emptied in a week. Potential for risk of discharge to the environment is high as the material allowed to remain on the ground as well as risk of exposure to employees.

PENALTY COMPUTATION WORKSHEET

Company Name: ROUGE STEEL COMPANY

Regulation Violated: Operation of a High-Waste Surface Impoundment w/o a permit
 Assessments for each violation should be determined on separate worksheets and totalled. or interim Status.

Part I - Seriousness of Violation Penalty

1. Potential for Harm: MODERATE
2. Extent of Deviation: MAJOR
3. Matrix Cell Range: _____
- Penalty Amount Chosen: 9500
- Justification for Penalty Amount Chosen: mid-range
4. Per-Day Assessment: _____

Part II - Penalty Adjustments

- | | <u>Percentage Change</u> | <u>Dollar Amount</u> |
|---|--------------------------|----------------------|
| 1. Good faith efforts to comply/lack of good faith: | _____ | _____ |
| 2. Degree of willfulness and/or negligence: | _____ | _____ |
| 3. History of Noncompliance: | _____ | _____ |
| 4. Other Unique Factors: | _____ | _____ |
| 5. Justification for Adjustments: | _____ | _____ |
| 6. Adjusted Per-day Penalty (Line 4, Part I + Lines 1-4, Part II): | _____ | _____ |
| 7. Number of Days of Violation: | _____ | _____ |
| 8. Multi-day Penalty (Number of days X Line 6, Part II): | _____ | _____ |
| 9. Economic Benefit of Noncompliance: | _____ | _____ |
| Justification: | _____ | _____ |
| 10. Total (Lines 8 + 9, Part II): | _____ | _____ |
| 11. Ability to Pay Adjustment: | _____ | _____ |
| Justification for Adjustment: | _____ | _____ |
| 12. Total Penalty Amount (must not exceed \$25,000 per day of violation): | _____ | <u>9500</u> |

Company was using a surface impoundment on site for solidification (treatment) of hazardous waste (tar decenter sludge).

Company had never notified, submitted a Part A or applied for a permit (Part B) for this land disposal unit. Because the '84 HSWA amendment requirements for certification were not met on Nov. 8, 1985 the facility must submit an adequate closure plan and properly close.

This unit is considered to be a surface imp. Since it was a man-made diked excavation designed to hold an accumulation of free liquids.

* Percentage adjustments are applied to the dollar amount calculated on Line 4, Part I.

individual financial statements on parent.

According to published reports the main labor union here approved salary and benefit cuts in late 1983 in order for the company to modernize the facility and remain competitive and stay in operation. The company reported that the business had been operating at a loss in recent years.

According to published reports, Rouge Steel Company (Inc) and U S Steel Corporation have agreed to build a corrosion resistant steel plant at Dearborn, MI. The venture is scheduled to cost between \$130-150 million. The two companies plan to split the cost evenly.

As of Dec 31 1984 the parent, on a consolidated basis, reported a tangible net worth of \$9,837,700,000 and a fair financial condition indicated. The parent is the second largest manufacturer of motor vehicles in the United States.

PUBLIC FILINGS

UCC FILINGS

08/22/85 Financing Statement #B658299 filed 04-23-85 with Secretary, State of MI. Debtor: Rouge Steel Company (Inc), Dearborn, MI. Secured Party: Hewlett-Packard Co, Sunnyvale, CA. Collateral: specified computer equipment.

08/22/85 Financing Statement #B501379 filed 12-29-83 with Secretary, State of MI. Debtor: Rouge Steel Company (Inc), Dearborn, MI. Secured Party: Union Carbide Corp, Tarrytown, NY. Collateral: leased equipment.

On the public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

HISTORY

08/22/85

PAUL L SULLIVAN, PRES+

JOHN SAGAN, V PRES-TREAS

SIDNEY KELLY, ASST SEC

DIRECTOR(S): The officers identified by (+) and R E Cook.

Incorporated Delaware Dec 14 1981. Authorized capital consists of 10,000 shares common stock, \$1 par value.

Business started 1981 by the parent as a division of Ford Motor Company. Present control succeeded 1982. 100% of capital stock is owned by the parent. Operating capital \$300,000,000 derived from the parent.

PAUL L SULLIVAN born 1933 married. Employed by the parent, Ford Motor Company, since 1956 and has held several management positions in that company's aerospace and steel subsidiaries.

JOHN SAGAN born 1921 married. Graduated Ohio Wesleyan University 1948 AB; 1949 University of Illinois MA economics; 1951 PhD. 1951 to present Ford Motor Company, staff economy analyst; 1966 treasurer; 1969 vice president-treasurer.

SIDNEY KELLY born 1922 married. Graduated Columbia University BA 1944; LLB 1948. 1943-46 U S Army, lieutenant. 1948-51 Lyeth & Voorhees, associate. 1951-54 State of New York, assistant counsel and confidential law assistant to Governor Dewey. 1955-56 State of New York, appellate cases. 1956-58 administrative assistant to Senator Javits. 1958-67 Wheeling Steel Co, assistant general counsel. 1967 to present, Ford Motor Company, senior attorney; 1967 assistant

	Ppt-Slow 60	2500	750	750		6-12 Mos
	Ppt-Slow 60	750	750	500		1 Mo
	Slow 5	15000	1000	250		
	Slow 30	750	-0-	-0-		
	Slow 30		-0-	-0-	N30	2-3 Mos
	Slow 30-60	5000	100	100	N30	
	Slow 60	750	-0-	-0-	1/2 10 N30	
	(043)	70000	100	100		2-3 Mos
	Unsatisfactory.					
	(044)	70000	100	100		2-3 Mos
	Unsatisfactory.					
12/85	Disc	1000	-0-	-0-	2 10 N30	6-12 Mos
	Disc-Ppt	500	100	-0-		1 Mo
	Ppt	400000	300000	10000		1 Mo
	Ppt	40000	-0-	-0-		6-12 Mos
	Ppt-Slow 60	2500	2500	2500	11	1 Mo
	Ppt-Slow 90	2500	750	750	N30	4-5 Mos
	Ppt-Slow 90	250	100	100	N7	1 Mo
	Slow	100000	605yP	-0-		1 Mo
	Slow 120	5000	500	250	2 10 N30	1 Mo
11/85	Ppt	1000	-0-	-0-		
	Ppt	100	-0-	-0-	N30	6-12 Mos
	Slow 5	2500	2500	2500		1 Mo
	(057)	2500	2500			
10/85	Ppt	30000	-0-	-0-	1/2 10 N30	
	Ppt	2500	2500	-0-	N30	1 Mo
	Ppt	2500	2500	-0-	N30	1 Mo
CHS	Ppt	250	250	-0-		1 Mo
	Ppt	100	-0-	-0-		6-12 Mos
	Ppt		-0-	-0-	N30	
	Ppt-Slow 30	600000	600000	90000	N30	1 Mo
	Pp;E&i=JKkjkjs53j					
kuk_L4h	Slow 30		100	100	100 N30	
	(067)	200000	90000			1 Mo
08/85	Ppt-Slow 30	70000	15000	7500		1 Mo
	Slow 30	1000	1000	1000	N30	
07/85	Ppt	2500	-0-	-0-	1/2 10 N30	6-12 Mos
	Ppt	2500	500	-0-		1 Mo
	Ppt	1000	1000	-0-		1 Mo
	Ppt	500	-0-	-0-		4-5 Mos
	Ppt-Slow 30	1000	1000	500		
	Slow 60	2500	2500	2500		
06/85	Ppt	2500	-0-	-0-		
	Ppt	500	-0-	-0-	N30	6-12 Mos
05/85	Ppt	2500	-0-	-0-		6-12 Mos
	Ppt	1000	-0-	-0-		6-12 Mos
	Ppt-Slow 60	2500	2500	1000		1 Mo

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

FINANCE

08/22/85

On AUG 22 1985 Kenneth Novak, oper acctg mgr, declined financial statement.

He said it remains corporate policy of the parent not to release

secretary and associate counsel; 1969 secretary; 1974 secretary and associate general counsel; assistant secretary of the subject 1981.

OPERATION
08/22/85

Subsidiary of Ford Motor Company (Inc), Dearborn, MI started 1903 which operates as a manufacturer of motor vehicles. Parent company owns 100% of capital stock. Parent company has 550 other subsidiaries. Intercompany relations: According to management, confined to loans, advances and administrative transactions settled monthly or per intercompany agreement.

Manufactures steel (95%). Through subsidiary mines taconite. This company operates an integrated flat roll steel mill. About 1/3 of output is sold to parent. Terms: 1/2% of 1% 10 net 30 days. Sells to industrial and automotive accounts. Territory :Nationwide. Nonseasonal.

EMPLOYEES: 5,000 including officers. 4,400 employed here.

FACILITIES: Owns 2,571,831 sq. ft. in 1 and 2 story steel building in normal condition. Premises neat.

LOCATION: Industrial section on main street.

SUBSIDIARIES: Subject has one wholly-owned subsidiary.

#*Z~ EVELETH TACONITE COMPANY, THE, Cleveland, OH. It is engaged in taconite mining with most sales to parent. No other reported intercompany relations. Financial details unavailable.

03-26(294 /849)

34102

001344746

013

H

(SR BUS) Chase Manhattan Bank, New York, NY

FULL DISPLAY COMPLETE

IN DATE

DUNS: 00-577-8980
 ROUSE STEEL COMPANY (INC)
 (SUBSIDIARY OF FORD MOTOR
 COMPANY (INC), DEARBORN, MI)
 3001 MILLER RD
 AND BRANCH(ES) OR DIVISION(S)
 DEARBORN MI 48120
 TEL: 313 323-0035

DATE PRINTED
 MAR 26 1986
 MFG STEEL
 SIC NO.
 33 12

SUMMARY
 RATING --
 STARTED 1982
 PAYMENTS SEE BELOW
 EMPLOYS 5,000
 (4,400 HERE)
 HISTORY CLEAR

CHIEF EXECUTIVE: PAUL L SULLIVAN, PRES

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
03/86	Ppt	2500	-0-	-0-		2-3 Mos
	Ppt	500	-0-	-0-		6-12 Mos
	Ppt-Slow 120	2500	2500	2500	N10	1 Mo
	Slow 60	7500	-0-	-0-		6-12 Mos
	(005)	750	-0-	-0-		1 Mo
	(006)	250	-0-	-0-	1 15 N30	
07/86	Ppt	100000	100000	100000		2-3 Mos
	Ppt	20000	50	50	N30	6-12 Mos
	Ppt	2500	100	100	N30	2-3 Mos
	4et	1000	1000	-0-		1 Mo
	Ppt-Slow 30	2500	2500	500	N30	1 Mo
	Ppt-Slow 30	2500	250	-0-		1 Mo
	Ppt-Slow 90	250	100	100	N30	1 Mo
	Slow 45	7500	-0-	-0-	N30	6-12 Mos
	Slow 30-90	100	100	50	N30	1 Mo
01/86	Ppt	60000	20000	-0-		1 Mo
	Ppt	60000	-0-	-0-		6-12 Mos
	Ppt	60000	-0-	-0-		6-12 Mos
	Ppt	50000	-0-	-0-		
	Ppt	50000	50000	-0-	N30	1 Mo
	Ppt	20000			N30	
	Ppt	15000	5000	-0-		1 Mo
	Ppt	15000	-0-	-0-		6-12 Mos
	Ppt	15000	-0-	-0-		6-12 Mos
	Ppt	5000	5000	-0-		1 Mo
	Ppt	1000	1000	-0-		1 Mo
	Ppt	100	-0-	-0-		1 Mo
	Ppt	50	-0-	-0-	N30	2-3 Mos
	Ppt	50	-0-	-0-		6-12 Mos
	Ppt-Slow 15	800000	800000	200000		1 Mo
	Ppt-Slow 15	70000	60000	7500		1 Mo
	Ppt-Slow 30	60000	20000	1000	1/2 10 N30	1 Mo
	Ppt-Slow 30	7500	-0-	-0-		4-5 Mos
	Ppt-Slow 30	2500	2500	250	1/2 10 N30	1 Mo
	Ppt-Slow 60	100000	100000	30000		1 Mo

COMPLAINANT'S EXHIBIT 21

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

~~XXXXXXXXXXXX~~

Gorden E. Guyer, Director
S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

July 15, 1986

NATURAL RESOURCES COMMISSION

JOHN J. ANDERSON
CARLENE J. FLUHARTY
ROON E. GUYER
JERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

Mr. Gerald Doroshewitz
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, MI 48121

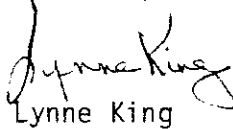
RE: MID 087738431

Dear Mr. Doroshewitz:

This letter is to acknowledge receipt of your response dated May 15, 1986, indicating your compliance program for RCRA deficiencies cited during staff inspection on March 14, 1986.

As you may be aware, a referral for escalated enforcement has been sent to U.S. EPA, Region V. Your letter has been referred to them. If you have any questions regarding this matter, please contact Laura Lodisio with the U.S. EPA, Region V at (312) 886-7090.

Sincerely,


Lynne King

Hazardous Waste Division

LK/aw

cc: B. Okwumabua
Laura Lodisio, U.S. EPA, Region V
U.S. EPA, Region V

RECEIVED

JUL 22 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

COMPLAINANT'S EXHIBIT 22

AUG 13 1986

George Kircos, Senior Attorney
 Ford Motor Company
 The American Road
 Room 554-WHQ
 Dearborn, Michigan 48121-1899

Re: Rouge Steel Company
 U.S. EPA I.D. No. MID 087 738 431

Dear Mr. Kircos:

As you discussed with Laura Lodisio of my staff by telephone on August 7, 1986, and in response to your request, I am forwarding a list of the specific violations for which penalties were assessed in the Administrative Complaint issued to Rouge Steel Company by the United States Environmental Protection Agency on July 22, 1986. They are as follows:

<u>Violation</u>	<u>Regulation</u>	<u>Penalty</u>
1) Treatment in a surface impoundment without a permit or interim status	40 CFR 270	9500.00
2) Treatment of reactive hazardous waste without a permit or interim status	40 CFR 270	2250.00
3) Failure to comply with TSD standards for treatment in a surface impoundment and by filtering	40 CFR 265 - Subparts A, B, C, D, E, F, G, H & O	9500.00
4) Failure to post required signs	40 CFR 262.34(a)(3) 40 CFR 265.14(c)	4000.00
5) Failure to conduct/document waste analysis to characterize solid waste	40 CFR 265.13	4000.00
6) Lack of adequate personnel training records	40 CFR 265.16(d)	1000.00
7) Failure to prevent release of hazardous waste to environment (i.e. spills)	40 CFR 265.31	6500.00

- 2 -

If you have questions regarding this matter please contact Roger Grimes, Assistant Regional Counsel at (312) 886-6595 or Laura Lodisio at (312) 886-7090. Staff will be prepared to discuss the above in more detail at the time of the settlement conference scheduled for August 20, 1985.

Sincerely,

William E. Muno, Chief
RCPA Enforcement Section

cc: Ben Okwumahua, MDNR

bcc: R. Grimes (5CS-16)
R. Karl (5HE-12)
L. Lodisio (5HE-12)

5HE-12:LLODISIO:ssmith:8/8/86

	TYPIST	ACTION	OTHER STAFF	DEPT CHIEF	SECT. SECTY	SECT. CHIEF	INVEST CHIEF	INVEST DIR
INT. DATE	AP 8-11-86	LKH 8-11-86		RCK 8-11-86	AP 8/11/86	WEM 8/11/86		

COMPLAINANT'S EXHIBIT 23

SEP 03 1986

5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Kircos, Senior Attorney
Ford Motor Company
The American Road
Room 554-WHO
Dearborn, Michigan 48121-1M95

Re: Rouge Steel Company
U.S. EPA ID No. MIU 087 738 431

Dear Mr. Kircos:

As discussed in the settlement conference with United States Environmental Protection (U.S. EPA) staff on August 20, 1986, I am enclosing a copy of a regulatory clarification document regarding "totally enclosed treatment facility" pursuant to 40 CFR 260.10(a). This should be helpful to Rouge Steel Company in the preparation of their submittal to demonstrate an exclusion pursuant to 40 CFR 265.1(c)(9).

If you have questions or desire further assistance please contact Roger Grimes at (312) 886-6595 or Laura Lodisio at (312) 886-7090.

Sincerely,
ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

bcc: R. Grimes (5CS-16)
R. Karl (5HE-12)
L. Lodisio (5HE-12)

5HE-12:LLDISIO:bphillips:6-7090:8-28-86

SUBJECT(S): Clarification of the definition and practical application of the term "totally enclosed treatment facility" (TETF).

REQUESTER: Mr. Ronald E. Meissen
Senior Environmental Engineer
Travenol Laboratories, Inc.
Deerfield, Illinois 60015

DATE OF INCOMING CORRESPONDENCE: March 3, 1981

DATE OF RESPONSE: July 27, 1981

SUMMARY OF RESPONSE: The definition of TETF appears in §260.10(a) as follows:

a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

The reason such facilities are exempt from the requirements of Part 264 and 265 is because they pose negligible risk to human health and the environment.

"Totally enclosed" means that the facility is completely contained on all sides and poses little or no potential for escape of waste to the environment, even during periods of process upset. As a practical matter, the definition limits totally enclosed treatment facilities to pipelines, tanks, and to other chemical, physical, and biological treatment operations which are carried out in tank-like equipment (e.g., stills, distillation columns, or pressure vessels) and which are constructed and operated to prevent discharge of potentially hazardous materials to the environment. This required consideration of the three primary avenues of escape: leakage, spills, and emissions.

TETF's must be "directly connected to an industrial production process", i.e., integrally connected via pipe to the product process. The term "industrial production process" was meant to include only those processes which produce a product, an intermediate, a byproduct, or a material which is used back in the production process. Thus, a totally enclosed treatment operation, integrally connected downstream from a wastewater treatment lagoon, would not be eligible for the exemption because the process to which it is connected is not an "industrial production process."

Hazardous waste treatment is often conducted in a series of unit operations, each connected by pipe to the other. As long as one end of a treatment train is integrally connected to a production process, and each unit operation is integrally connected to the

other, all qualify for the exemption, if they meet the requirement of being "totally enclosed." If one unit operation is not "totally enclosed" or is not "integrally connected," then only unit operations upstream from that unit would qualify for the exemption. The non-qualifying unit operation and downstream processes would require a permit.

The exemption for TETF's applies only to the facility itself, the effluent from a TETF may still be regulated. If the waste entering the TETF is listed in Subpart D of Part 261, then the effluent from the facility is automatically a hazardous waste and must be treated as such, unless it is "delisted" in accordance with §§260.20 and 260.22. If the waste entering the TETF is hazardous because it meets one of the characteristics described in Subpart C of Part 261, then the effluent is a regulated hazardous waste only if it meets one of the characteristics.

Finally, if the effluents from a TETF are discharged to a surface water body (e.g., lake or stream) or to a publicly owned treatment works or sewer line connected thereto, then these wastes are subject only to the Clean Water Act and regulations promulgated thereunder, and are not subject to RCRA hazardous waste controls.

TOTALLY ENCLOSED TREATMENT FACILITY

Regulatory Clarification

I. Issue: From questions asked since promulgation of the regulations on May 19, 1980, it is clear that the definition and practical application of the term "totally enclosed treatment facility" require clarification.

II. Discussion: The definition appears in §260.10(a) as follows:

Totally enclosed treatment facility means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

A facility meeting this definition is exempted from the requirements of Parts 264 and 265 (See §§264.7(g)(5) and 265.1(c)(9)) and, by extension, the owner or operator of that facility need not notify nor seek a permit for that process. The purpose of this provision is to remove from active regulation those treatment processes which occur in close proximity to the industrial process which generates the waste and which are constructed in such a way that there is little or no potential for escape of pollutants. Such facilities pose negligible risk to human health and the environment.

The part of the definition which has generated the most uncertainty is the meaning of "totally enclosed." The Agency intends that a "totally enclosed" treatment facility be one which is completely contained on all sides and poses little or

no potential for escape of waste to the environment even during periods of process upset. The facility must be constructed so that no predictable potential for overflows, spills, gaseous emissions, etc., can result from malfunction of pumps, valves, etc., associated with the totally enclosed treatment or from a malfunction in the industrial process to which it is connected. Natural calamities or acts of sabotage or war (e.g., earthquakes, tornadoes, bombing, etc.) are not considered predictable, however.

As a practical matter, the definition limits "totally enclosed treatment facilities" to pipelines, tanks, and, to other chemical, physical, and biological treatment operations which are carried out in tank-like equipment (e.g., stills, distillation columns, or pressure vessels) and which are constructed and operated to prevent discharge of potentially hazardous material to the environment. This requires consideration of the three primary avenues of escape: leakage, spills, and emissions.

To prevent leaking, the tank, pipe, etc., must be made of impermeable materials. The Agency is using the term impermeable in the practical sense to mean no transmission of contained materials in quantities which would be visibly apparent. Further, as with any other treatment process, totally enclosed treatment facilities are subject to natural deterioration (corrosion, etc.) which could ultimately result in leaks. To meet the requirement in the definition that treatment be conducted

" . . . in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment . . . ,"
the Agency believes that an owner or operator claiming the exemption generally will have to conduct inspections or other discovery activities to detect deterioration and carry out maintenance activities sufficient to remedy it. A tank or pipe which leaks is not a totally enclosed facility. As a result, leaks must be prevented from totally enclosed facilities or the facility is in violation of the regulations.

A totally enclosed facility must be enclosed on all sides. A tank or similar equipment must have a cover which would eliminate gaseous emissions and spills. However, many tanks incorporate vents and relief valves for either operating or emergency reasons. Such vents must be designed to prevent overflows of liquids and emissions of harmful gases and aerosols, where such events might occur through normal operation, equipment failure, or process upset. This can often be accomplished by the use of traps, recycle lines, and sorption columns of various designs to prevent spills and gaseous emission. If effectively protected by such devices, a vented tank would qualify as a totally enclosed treatment facility.

When considering protective devices for tank vents, the question arises as to whether the protective device is itself adequate. The test involves a judgment as to whether the overflow or gaseous emission passing through the vent will be

prevented from reaching the environment. For example, an open catchment basin for overflows is not satisfactory if the hazardous constituents in the waste may be emitted to the air. Similarly, it may also not be satisfactory if it is only large enough to hold the tank overflow for a brief period before it also overflows. However, even in this situation, alarm systems could be installed to ensure that the capacity of the catchment basin is not exceeded. Where air emissions from vents or relief valves are concerned, if the waste is non-volatile or the emissions cannot contain gases or aerosols which could be hazardous in the atmosphere, then no protective devices are necessary. An example might be a pressure relief valve on a tank containing non-volatile waste. Where potentially harmful emissions could occur, then positive steps must be taken. For example, the vent could be connected to an incinerator or process kiln. Alternately, a sorption column might be suitable if emission rates are low, the efficiency of the column approaches 100 percent, and alarms or other safeguards are available so that the upset causing the emission will be rectified before the capacity of the column is exceeded. Scrubbers will normally not be sufficient because of their tendency to malfunction and efficiencies typically do not approach 100 percent.

Tanks sometimes have floating roofs. To be eligible as a totally enclosed facility, such tanks should be constructed so that the roof has a sliding seal on the side which is designed

to prevent gaseous emissions and protect against possible overflow.

The part of the definition requiring that totally enclosed treatment facilities be "directly connected to an industrial production process" also generates some uncertainty. As long as the process is integrally connected via pipe to the production process, there is no potential for the waste to be lost. The term "industrial production process" was meant to include only those processes which produce a product, an intermediate, a byproduct, or a material which is used back in the production process. Thus, a totally enclosed treatment operation, integrally connected downstream from a wastewater treatment lagoon would not be eligible for the exemption because the process to which it is connected is not an "industrial production process." Neither would any totally enclosed treatment process at an off-site hazardous waste management facility qualify, unless it were integrally connected via pipeline to the generator's production process. Obviously, a waste transported by truck or rail is not integrally connected to the production process.

Hazardous waste treatment is often conducted in a series of unit operations, each connected by pipe to the other. As long as one end of a treatment train is integrally connected to a production process, and each unit operation is integrally connected to the other, all qualify for the exemption if they meet the requirement of being "totally enclosed." If one unit operation is not "totally enclosed" or is not "integrally connected,"

then only unit operations upstream from that unit would qualify for the exemption. The unit and downstream process would require a permit.

The device connecting the totally enclosed treatment facility to the generating process will normally be a pipe. However, some pipes (e.g., sewers) are constructed with manholes, vents, sumps, and other openings. Pipes with such openings may qualify as totally enclosed only if there is no potential for emissions or overflow of liquids during periods of process upset, or if equipment (sorption columns, catchment basins, etc.) has been installed to prevent escape of hazardous waste or any potentially hazardous constituent thereof to the environment.

This exemption for totally enclosed treatment facilities applies only to the facility itself. The effluent from that facility may still be regulated. If the waste entering the totally enclosed treatment facility is listed in Subpart D of Part 261, then the effluent from the facility is automatically a hazardous waste and must be treated as such, unless it is "delisted" in accordance with §§260.20 and 260.22. If, on the other hand, the waste entering the totally enclosed treatment facility is hazardous because it meets one of the characteristics described in Subpart C of Part 261, then the effluent waste is a regulated hazardous waste only if the effluent meets one of the characteristics. Since the totally enclosed treatment facility is exempted from the regulatory requirements, it is only the effluents from such processes which are of interest

to the Agency. Thus, whether the waste in a totally enclosed treatment facility must be considered towards the 1000 kg/month small quantity generator limit, depends on whether it is a regulated hazardous waste as it exits the totally enclosed treatment facility.

Finally, it is important to note that if the effluents from a totally enclosed treatment facility are discharged to a surface water body (lake or stream) or to a publicly owned treatment works or sewer line connected thereto, then these wastes are not subject to the RCRA hazardous waste controls at all but are, instead, subject to the Clean Water Act and regulations promulgated thereunder (See 45 FR 76075).

III. Resolution: In sum, a "totally enclosed treatment facility" must:

- (a) Be completely contained on all sides.
- (b) Pose negligible potential for escape of constituents to the environment except through natural calamities or acts of sabotage or war.
- (c) Be connected directly by pipeline or similar totally enclosed device to an industrial production process which produces a product, byproduct, intermediate, or a material which is used back in the process.

COMPLAINANT'S EXHIBIT 24

Deleted

COMPLAINANT'S EXHIBIT 25

Deleted

COMPLAINANT'S EXHIBIT 26

3. Paragraph 3 recites the existence of regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon the material facts.

4. Respondent admits the allegations of Paragraph 4 and asserts that it currently generates only the following hazardous wastes: F001; K061; K062; D001 and D003 and disposes of D003 by means of an underground injection well.

5. Paragraph 5 recites statutory and regulatory provisions which do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based on material facts.

6. Paragraph 6 recites regulatory provisions which do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based on material facts.

7. Paragraph 7 recites statutory and regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon material facts.

8. Respondent admits the allegations of Paragraph 8.

9. Paragraph 9 recites regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon material facts.

10. Paragraph 10 recites regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined and based upon material facts.

11. Respondent admits that on March 14, 1986, a RCRA compliance inspection was conducted. Respondent denies the allegation of Paragraph 11 that Respondent was, or is, treating decanter tank tar sludge from coking operations. Respondent denies the allegation of Paragraph 11 that it maintained a "surface impoundment" or "impoundment" as defined in 40 CFR § 260.10.

12. Respondent denies the allegation contained in Paragraph 12. Respondent asserts that the filtration of EPA Hazardous Waste No. D003 is within a "totally enclosed facility" exempt from being considered a treatment facility pursuant to 40 CFR §270.1(c)(2)(iv) and §265.1(c)(9).

13. Respondent denies the allegation of Paragraph 13 that it owns and operates a surface impoundment for the treatment of hazardous wastes and denies, therefore, that it is subject to all applicable requirements of 40 CFR Part 265 Subparts A, B, C, D, E, F, G, H, K, and Q and the permit requirements of 40 CFR Part 270.

14. Paragraph 14 recites statutory and regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be based on material facts.

15. Respondent admits the allegation of Paragraph 15.

16. Respondent denies the allegations contained in Paragraph 16. Respondent asserts that it has not maintained, and does not maintain a "surface impoundment" and, therefore, was not required to file a Part B.

17. Respondent admits the allegations contained in Paragraph 17. In addition, however, Respondent asserts that the MDNR letter of January 23, 1985, pertained only to the No. 2 deep well. Respondent further asserts that it was told orally by EPA to ignore the request, as the well was covered by 40 CFR 265 Subpart R.

18. Respondent admits the allegations contained in Paragraph 18.

19. Respondent admits the allegations contained in Paragraph 19, and asserts that based on the finding of Paragraph 19, Paragraphs 17, 18, and 19 should be withdrawn from the Complaint.

20. (a) Respondent denies the allegations contained in Paragraph 20(a), and asserts that 40 CFR §265.13 is not relevant to any hazardous wastes other than EPA Hazardous Waste No. D003.

(b) Respondent denies, in part, the allegation of Paragraph 20(b). Respondent asserts that it had not failed to post "Danger" signs at disposal areas. Respondent asserts that any failure to post "Hazardous Waste" signs has since been remedied.

(c) Respondent denies the allegations contained in Paragraph 20(c). Respondent asserts that any spill of a hazardous waste was de minimis and that remedial action to prevent recurrence has been taken.

(d) Respondent denies the allegations contained in Paragraph 20(d).

21. Respondent admits the receipt of the letter from MDNR.

COMPLIANCE ORDER

A. Respondent asserts that it does not treat, store or dispose of hazardous waste except as is in compliance with applicable standards.

B. Respondent asserts that it does not operate a surface impoundment and, therefore, is not required by law to submit a closure plan.

C. Respondent asserts that it is not required by law to submit a Part A application for a RCRA permit, as it does not operate a surface impoundment nor does Respondent treat hazardous waste.

D. Respondent asserts that it does not treat EPA Waste No. D003 and, therefore, is not required to comply with the requirements of 40 CFR 265 Subparts A, B, C, D, E, G, H and Q regarding the treatment of reactive hazardous waste.

E. Respondent asserts that by a letter dated May 15, 1986 to the MDNR, Respondent has already demonstrated compliance with the requirements of Paragraphs E(1), (2), (3) and (4), to the extent required by law.

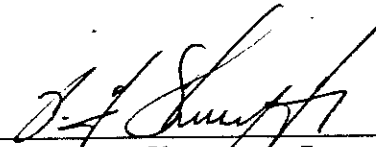
PROPOSED CIVIL PENALTY

Respondent asserts that the proposed penalty assessment of Thirty-Six Thousand Seven Hundred and Fifty Dollars (\$36,750) is excessive in light of Respondent's assertions above.

REQUEST FOR HEARING

Respondent requests a hearing on the material facts contained in the Complaint and on the amount of the proposed penalty assessment.

Respectfully submitted,

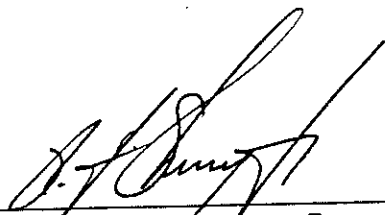


Peter J. Sherry, Jr.
Attorney for Respondent
Rouge Steel Company
The American Road
Dearborn, Michigan 48121-1899
(313) 845-5122

1258Q

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August, 1986, the foregoing Answer and Request for Hearing (a) was filed by placing the original in the United States mails, postage pre-paid, and addressed to Ms. Beverly Shorty, Regional Hearing Clerk, (5MF-14), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, and (b) has been served by placing a copy thereof in the United States mails, postage pre-paid, and addressed to Roger Grimes, Office of the Regional Counsel, (5C-16), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.



Peter J. Sherry, Jr.

1281Q

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
REGION V

ANSWER AND REQUEST FOR
HEARING

2. Paragraph 2 recites provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon the material facts.

COMPLAINANT'S EXHIBIT 27



Burmah Technical Services, Inc.
Analytical Laboratories Division

408 Auburn Avenue
Pontiac, MI 48058
313/334-4747

Ford Motor Company
Rouge Manufacturing
3001 Miller Road
Dearborn, MI 48212
Attn: George Waggoner 323-1260

May 22, 1986

Sample received: 4-25-86

Sample Number: 7211
Client I.D.: #3
Diatomaceous
Earth
Medium

7212
#4 Sample
in Filter
Bag

As Received

Cyanide, Total, CN, mg/kg	70	420
Sulfide, S, mg/kg	<0.2	<0.2
Water, by distillation, %	--	--
Naphthalene, %	13	7



Burmah Technical Services, Inc.
Analytical Laboratories Division

408 Auburn Avenue
Pontiac, MI 48058
313/334-4747

Ford Motor Company
Rouge Manufacturing
3001 Miller Road
Dearborn, MI 48212
Attn: George Waggoner 323-1260

May 22, 1986

Sample Received: 4-25-86

Sample Number: 7211

Client I.D.: #3 Diatomaceous
Earth Medium

PHENOLICS	mg/kg
2-Chlorophenol	<50
2-Nitrophenol	<50
Phenol	≤420
2,4-Dimethylphenol	<50
2,4-Dichlorophenol	<50
2,4,6-Trichlorophenol	<50
4-Chloro-3-methylphenol	<50
2,4-Dinitrophenol	<75
2-Methyl-4,6-dinitrophenol	<75
Pentachlorophenol	<75
4-Nitrophenol	<100

Where a number is reported as " \leq " (less than or equal to), the number represents the amount of the compound that is/could be present assuming that the entire observed response is the compound of concern.

Comments: Elevated detection limits reported due to sample matrix interference.



Burmah Technical Services, Inc.
Analytical Laboratories Division

408 Auburn Avenue
Pontiac, MI 48058
313/334-4747

Ford Motor Company
Pouge Manufacturing
3001 Miller Road
Dearborn, MI 48212
Attn: George Waggoner 323-1260

May 22, 1986

Sample Received: 4-25-86

Sample Number:

7212

Client I.D.:

#4 Sample in
Filter Bag

PHENOLICS

mg/kg

2-Chlorophenol	≤40
2-Nitrophenol	<10
Phenol	≤10
2,4-Dimethylphenol	≤1,900
2,4-Dichlorophenol	<10
2,4,6-Trichlorophenol	<10
4-Chloro-3-methylphenol	<10
2,4-Dinitrophenol	<15
2-Methyl-4,6-dinitrophenol	<15
Pentachlorophenol	<15
4-Nitrophenol	<20

Where a number is reported as "≤" (less than or equal to), the number represents the amount of the compound that is/could be present assuming that the entire observed response is the compound of concern.

EPTox/5r

Susan K Scott
Laboratory Supervisor

COMPLAINANT'S EXHIBIT 28

FORM 1
GENERAL
EPA
ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F M I D O 8 7 T 3 8 4 3 1 3 D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

A I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		NA
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
I. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
J. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP FORD MOTOR COMPANY STEEL DIVISION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)
2 COSTANTINO M S MANAGER

B. PHONE (area code & no.)
313 323 1260

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX
3 3001 MILLER RD ROOM 2112 ROB

B. CITY OR TOWN
4 DEARBORN

C. STATE
MI

D. ZIP CODE
48121

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
3001 MILLER ROAD

B. COUNTY NAME
WAYNE

C. CITY OR TOWN
DEARBORN

D. STATE
MI

E. ZIP CODE
48121

F. COUNTY CODE
163

FORM 1		ENVIRONMENTAL PROTECTION AGENCY		I. EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		F M I D 0 8 7 T 3 8 4 3 1	
		Consolidated Permits Program			
		<i>(Read the "General Instructions" before starting.)</i>			
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
II. FACILITY NAME				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
V. MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		NA	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	FORD MOTOR COMPANY STEEL DIVISION	
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IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	COSTANTINO M S MANAGER	313	323 1260

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	3001 MILLER RD ROOM 2112 ROB	DEARBORN		MI	48121

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
4	3001 MILLER ROAD	WAYNE		DEARBORN	MI	48121	163

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	3	3	1	2	(specify)	7	4
Blast Furnace and Steel Mills				Electric Services			
C. THIRD				D. FOURTH			
7				(specify)	7		

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?					
FORD MOTOR COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)												D. PHONE (area code & no.)					
F = FEDERAL S = STATE P = PRIVATE				M = PUBLIC (other than federal or state) O = OTHER (specify)				P (specify)				3 1 3 5 9 4 0 3 2 4					
E. STREET OR P.O. BOX																	
PARKLANE TOWERS SUITE 628 W																	
F. CITY OR TOWN												G. STATE		H. ZIP CODE		IX. INDIAN LAND	
DEARBORN												MI		4 8 1 2 6		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)												D. PSD (Air Emissions from Proposed Sources)											
MI 0003361												P											
B. UIC (Underground Injection of Fluids)												E. OTHER (specify)											
U												009736882 (specify) Michigan Mineral Well Permit											
C. RCRA (Hazardous Wastes)												E. OTHER (specify)											
R												184754882 (specify) Michigan Mineral Well Permit											

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9:A/50

XII. NATURE OF BUSINESS (provide a brief description)

The Ford Motor Company, Steel Division, is an integrated steel mill engaged in the manufacture of hot and cold rolled, flat, automotive steel products.

F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
P. T. Brosnahan, General Manager Steel Division		Paul T. Brosnahan		10-17-80	

COMMENTS FOR OFFICIAL USE ONLY

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CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY															
W M I D O 8 7 7 3 8 4 3 1 3 1													W DUP 3 2 DUP															
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES															
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)			1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	D	0	0	3										T	D	7	9											
2																												
3																												
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IV. DESCRIPTION OF HAZARDOUS WASTE *(continued)***E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1.**

EPA I.D. NO. (enter from page 1)															
S	F	M	I	D	0	8	7	7	3	8	4	3	1	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

V. FACILITY DRAWINGAll existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail). **F6: A/53****VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
55	56	57	58	59	60	61	62	63	64	72	73	74	75	76	77	78	79	80	81

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																			
3. STREET OR P.O. BOX															4. CITY OR TOWN										5. ST.					6. ZIP CODE				

IX. OWNER CERTIFICATION

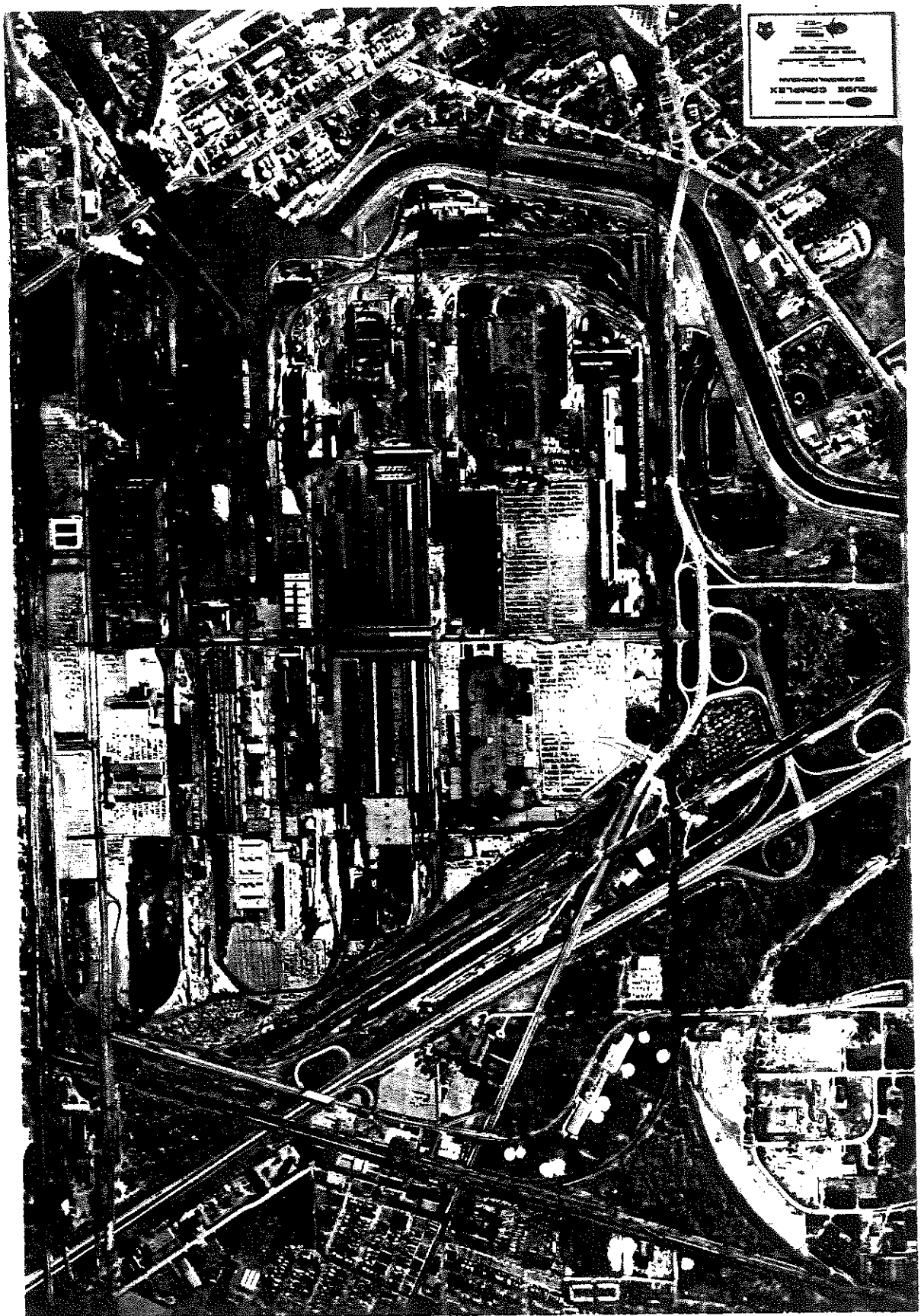
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	
P. T. Brosnahan, General Manager Steel Division		<i>Paul T. Brosnahan</i>		11-17-86	

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

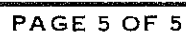
A. NAME (print or type)		B. SIGNATURE		C. DATE SIGNED	



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FORD MOTOR COMPANY - STEEL DIVISION
EPA I.D. NUMBER: MID 087738431

The water intake for this facility (Jefferson Screen House), number 820248, is located within the Detroit Quadrangle of the U.S. G.S. snap series at 8180 Medina Avenue, Detroit, Michigan.



COMPLAINANT'S EXHIBIT 29



~~no action taken~~
~~pending decision~~
~~by reg. council~~

~~copy to RA~~
~~copy to HQ~~

3001 Miller Road
P. O. Box 1699
Dearborn, Michigan 48121-1699

Name Changed to Rouge Steel Co
4-30-82
MGP

March 24, 1982

orig to RA
copy to HQ

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A 3587
Chicago, Illinois 60690

Subject: Name Change for Ford Motor Company, Steel Division
U.S. EPA I.D. Number MID 087738431 g TSD PA

This is to notify you that Ford Motor Company has changed the name of its Steel Division to Rouge Steel Company, a wholly-owned subsidiary.

Due to this change and changes in personnel, a new RCRA "Form 1 - General" has been completed and is attached. All other information remains the same.

Kindly substitute this Form for our earlier submittal.

Yours very truly,

J. A. Esper
Manufacturing Engineering and
Environmental Control Manager

Attachment

RECEIVED

1982

WASTE MANAGEMENT DIVISION
ENVIRONMENTAL

RECEIVED
3/29/82



INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transfer to a principal place of business. Please refer to the **INSTRUCTIONS FOR FILING NOTIFICATION** before completing this form. The information requested herein is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

COMMENTS

CONTINUE ON REVERSE

COMPLAINANT'S EXHIBIT 30

ROUGE STEEL COMPANY
HAZARDOUS WASTE CONTINGENCY PLAN

CONTENTS

Plant Operations

Emergency Notification Protocol

Contingency Plan - General

Explanation of Key Terms

Specific Wastes

Coke Oven Drip Water

Final Cooler Water

Electric Furnace Dust

Light Oil Muck

Coke Oven Tar Storage Tank Sludge

Mineral Spirits

Waste Pickle Liquor

Waste Halogenated Solvents

Training Program

Training - Personnel Lists

Appendix - Spill/RCRA Check Lists

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PLANT OPERATIONS

The Rouge Steel Company is involved in the production and processing of steel and resulting by-products. As a result of these activities and the waste products produced, the facility is classified as a Generator of Hazardous Wastes and is subject to the regulations of 40 CFR 262, 40 CFR 264, and 265.

Treatment Storage and Disposal

Hazardous wastes generated at this facility and their corresponding waste code numbers are as follows:

- Coke oven drip water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the presence of cyanide and sulfide.
- Final cooler water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the concentration of cyanide and sulfide.
- Coke oven tar sludge (K087) - regulated under 40 CFR 261.23 (a) (5)
- Light oil Muck (D003) - regulated under 40 CFR 261.23 (a) (5) due to cyanide.
- Waste halogenated solvents (F001) - listed as hazardous in 40 CFR 261.31; 1, 1, 1-trichloroethane from vapor degreasing and methylene chloride from dip degreasing.
- Electric arc furnace dust (K061) - listed under 40 CFR 261.32 because of the potential presence of chromium, lead, and cadmium.
- Waste pickle liquor (K062) - listed under 40 CFR 261.32 because of the possible presence of chromium and lead.
- Waste mineral spirits (D001) - combustible material from parts washers; serviced by Safety Kleen. Mineral spirits are reprocessed by Safety Kleen per 40 CFR 265.

On-site disposal of final cooler water occurs through deep-well injection. This portion of the facility is regulated under 40 CFR 265.430. All of the other wastes are transported off-site for disposal.

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EMERGENCY NOTIFICATION PROTOCOL

Personnel are instructed to immediately contact the Rouge Fire Department in the event of a spill of hazardous materials. The Plant security Office is staffed 24 hours per day, 365 days per year, and maintains an up-to-date emergency call list.

Rouge Fire Department
3001 Miller Road
Dearborn, MI 48121

(313) 322-3313
(313) 322-3316

An Environmental representative has been assigned responsibility for coordinating responses to environmental incidents such as hazardous waste spills. Plant Security has been instructed to immediately contact this individual in the event of a serious spill which cannot be contained by on-scene personnel or which poses a threat to public health or the environment.

On weekends and off-shifts, Security will contact the assigned "on call" Environmental Engineer. The "on call" list is published the last week of each month for the succeeding month.

The "on call" list distribution is:

W. Dotterrer	(Environmental Services)
Gas Dispatcher	(Primary Operations)
J. Stewart	(Marine Operations)
R. Klaes	(Melting Operations)
D. McDermid	(Hot Mills Operations)
N. Pahl	(Cold Mills Operations)
S. Polonczyk	(Security)
S. Rosa	(Power Operations)
R. Sayre	(Safety)
G. T. Simmons	(Rouge Fire Department)

PRIMARY EMERGENCY COORDINATOR

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Gerald Doroshewitz
13745 Strathcona #227
Southgate, MI 48195
284-7648

If the Primary Emergency Coordinator cannot be reached, Plant Security has been instructed to contact an Alternate Emergency Coordinator.

John Forrester
4249 Climbing Way
Ann Arbor, Michigan 48103
1-426-3631

William Gaines
45021 Foxton
Novi, Michigan 48050
1-348-3414

G. E. Waggoner, Jr.
6775 Plainfield
Dearborn Heights, MI 48127
274-4925

Rudolph Dawson
2164 Margery Street
Ypsilanti, Michigan 48198
1-485-4270

Stephen Landes
1260 Barrister
Ann Arbor, Michigan 48105
1-769-7570

David O'Connor
18680 Bungalow Drive
Lathrup Village, Michigan 48076
569-7742

Robert Toth
22355 Kingston Court
Woodhaven, Michigan 48183
676-1450

Outside Agencies

In the event of an incident which presents a serious hazard to property or public health and safety, the Rouge Fire Department will notify the following municipal agencies:

Dearborn Fire Department
Telephone: 943-2100

Dearborn Police Department
Telephone: 943-2200

Minor medical problems would be handled by the on-site facility:

Rouge Medical Facility
Telephone: 323-0045
Ambulance: 322-1133
Emergencies: 322-3313
322-3316

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Outside Agencies (continued)

In the event of a significant incident involving personal injury, the emergency facilities of Oakwood Hospital would be used.

Oakwood Hospital
18101 Oakwood, near Southfield
Dearborn, MI 48124
Emergency Department: 593-7440

Other than the above mentioned emergency responses to the local public safety agencies, it is the responsibility of the Environmental Representative to notify the appropriate governmental agencies in the event of an environmental incident. The various agencies which would be notified, as appropriate, include the following:

Primary Contacts

1. U.S. Coast Guard - EPA
National Response Center
Washington, DC
(800) 424-8802
2. State of Michigan
Department of Natural Resources
Pollution Emergency Alert System (PEAS)
(800) 292-4706

Alternate Contacts

1. U.S. Coast Guard
Captain of the Port - Detroit
Marine Safety Office
McNamara Office Building
(313) 226-7777
2. U.S. Environmental Protection Agency, Region V
Michigan-Ohio District Office
9311 Groh Road
Grosse Ile, MI 48138
(313) 675-6500
3. Michigan Department of Natural Resources
Detroit Area District
15500 Sheldon Road
Northville, MI 48167
(313) 459-9180

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In the event that hazardous materials have been or are likely to be discharged to the sewer system, the following agencies are also to be notified:

Detroit Water and Sewage Department
933-4145
or 833-4077

Dearborn Water Department
943-2307

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HAZARDOUS WASTE CONTINGENCY PLAN

The following General Contingency Plan will be initiated upon any release of hazardous materials which cannot be maintained by on-scene personnel and that could threaten human health or the environment. It will also be instituted upon recognition of any condition which could result in such a release if not corrected or controlled. Detailed specific plans apply to each of the individual hazardous materials present on-site.

A. Responsibilities of On-Scene Personnel

1. Initiate notification procedure according to emergency call list, providing the following information:
 - a. Location of incident.
 - b. Extent of emergency response required (e.g. fire apparatus, ambulance).
 - c. Any circumstances known which may affect emergency response.
 - d. Name of person making report.
2. Initiate spill response and control measures, such as:
 - a. Close valves to isolate system where possible.
 - b. Isolate spill to greatest extent possible by use of earthen dams or absorbent materials. Do not use absorbents to soak up spilled material unless necessary to prevent material from moving into sewers, confined spaces or the river.
 - c. Provide barriers to prevent unauthorized access to spill site.
3. Remain on-site until arrival of emergency response personnel.

B. Responsibility of Emergency Coordinator

1. Evaluate situation based on initial information and give instructions as required.
2. Proceed immediately to location of incident to direct emergency efforts.
3. If a release of hazardous waste has occurred which could threaten human health or the environment, immediate notification must be given to the National Response Center (800) 424-8802, including:
 - a. Reporting individual's name and telephone number.
 - b. Rouge Steel Company and location of spill (e.g. coke ovens).
 - c. Time and type of incident.
 - d. Amount and name of materials involved.
 - e. Any injuries.
 - f. Hazards to public health and environment.
4. Immediately make a complete record of the incident.
5. Submit a written report to the EPA Regional Administrator and the Michigan Department of Natural Resources within 15 days of the incident (264.56j).

Rev.:

Date:

Page:

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

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EXPLANATIONS OF WORDS AND TERMS

Full Protective Clothing

This means protection to prevent inhalation of, ingestion of, or skin contact with hazardous vapors, liquids and solids. It includes a helmet, self-contained breathing apparatus, coat, pants, rubber boots and gloves customarily worn by fire fighters. This turnout clothing may not provide protection from vapors, liquids or solids encountered during hazardous materials incidents. Full protective clothing should meet the OSHA Fire Brigades Standard (29 Code of Federal Regulations 1910.156). Chemical-cartridge respirators or gas masks are not acceptable substitutes for self-contained breathing apparatus. The demand-type self-contained breathing apparatus is being phased out of service since it does not meet the OSHA Fire Brigades Standard cited above.

Special Protective Clothing and Equipment

This category of clothing and equipment will protect the wearer against the specific hazard for which it was designed. The special clothing may afford protection only for certain chemicals and may be readily penetrated by chemicals for which it was not designed. Do not assume any protective clothing is fire resistant unless that is specifically stated by the manufacturer.

Isolate Hazard Area and Deny Entry

Keep everybody away from the hazard area if not directly involved with the emergency response or rescue operation. Do not let unprotected people into the area. Conduct any rescue operation as quickly as possible entering the scene from the upwind approach. This "isolate" step is the first to be taken even if "evacuation" is to follow.

Evacuate

Remove all people from area and buildings as far as recommended in the evacuation distance table presented in the back of this guidebook. Good judgment must be used in evacuation procedures to avoid placing people in greater danger. Topographic maps may assist you in the planning and execution of evacuations. You may obtain indexes of the topographic maps published for each state free of charge on request from the nearest office of The U.S. Geological Survey. Buy the maps you need to cover your area of responsibility. Preplanning and response team training is recommended.

Decontamination of Personnel and Equipment

Emergency services personnel should be decontaminated as soon as possible after contact occurs. Since the methods to be used differ from one chemical to another it is important to contact the shipper and medical authorities quickly to determine the most appropriate decontamination procedures. Contaminated protective clothing and equipment should be isolated to prevent further human contact, and should be stored in a restricted area (hot zone) at the incident site until appropriate decontamination procedures can be determined. In some cases, protective clothing and equipment cannot be decontaminated and will have to be disposed of according to appropriate state and federal guidelines.

Positive Pressure Breathing Apparatus

Positive pressure breathing apparatus is the best choice for complete protection during operations involving hazardous materials. Use apparatus certified by NIOSH and the Mine Safety and Health Administration in accordance with 30 Code of Federal Regulations Part II (30 CFR Part II) and used in accordance with the Respiratory Protection Standard (29 CFR 1910.134) and the OSHA Fire Brigades Standard (29 CFR 1910.156).














*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

Emergency Equipment Plot Plan

Legend

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MAP SYMBOLS

	AUTOMATIC SPRINKLERS		WATER
	SPRINKLER RISER		STRETCHER
	TRIPLE HYDRANT		BOX
	AIR PACK		FIRE HOSE
	FIRE BLANKET		P.I.V. POST. IND. VAL.
	ANSUL DRY CHEMICAL		FOAM HOSE
	CARBON DIOXIDE		PULL STATION

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HAZARDOUS MATERIALS INVENTORY

Material: Coke Oven Drip Water

Type of Storage: 5 - 10,000 gallon tanks*
1 - 5,000 gallon tank*
2 - 2,000 gallon tanks**
2 - 1,500 gallon tanks**
1 - 1,000 gallon tank**
1 - 12,000 gallon tank*

Location Various locations in coke oven area

Method of Disposal: Removed by licensed waste hauler

*Above ground tank locations:

1. XX Bldg. - North
2. XX Bldg. - South
3. North Quench Tower
4. Coal and Coke Lab
5. West Head House
6. EE Bldg. - N. E. Corner
7. Gas Holder

**Underground tank locations:

1. JJ Building
2. Old Booster Station
3. Continuous Caster (Specialty Fdry)
4. Frame Plant East
5. Frame Plant West

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Oven - Drip Water

Description

Moisture in Coke oven gas condenses and collects in gas piping. This material is captured at drip legs and is accumulated in tanks. It is normally used as coke quench make up.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable (Flash)	90°C	-	No
. Corrosive (ph)	7.8	6.1	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	-	No
Caustic	-	-	No
Cyanide (mg/l)	720	690	Yes
Sulfide (mg/l)	120	302	Yes
Explosive	-	-	No
. Toxic (in mg/l)			
Arsenic	0.003	0.2	No
Barium	0.10	0.2	No
Cadmium	0.02	0.1	No
Chromium	0.03	0.1	No
Lead	0.18	0.1	No
Mercury	0.116	0.1	No
Selenium	0.004	0.1	No
Silver	0.01	0.1	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, Liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003 (Reactive: Cyanide and Sulfide)
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

Revision:
Date:
Page:

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 55

HEALTH HAZARDS

Poisonous; may be fatal if inhaled, swallowed or absorbed through skin.
Contact may cause burns to skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control water may give off poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Cylinder may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Ventilate closed spaces before entering them.
Wear **positive pressure** breathing apparatus and special protective clothing.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Fight fire from maximum distance.
Dike fire control water for later disposal; do not scatter the material.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material
and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container
and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin or eyes with running
water for at least 15 minutes.
Speed in removing material from skin is of extreme importance.
Remove and isolate contaminated clothing and shoes at the site.
Keep victim quiet and maintain normal body temperature.
Effects may be delayed; keep victim under observation.

*NOTE: This information is taken from the "1984 Emergency Response
Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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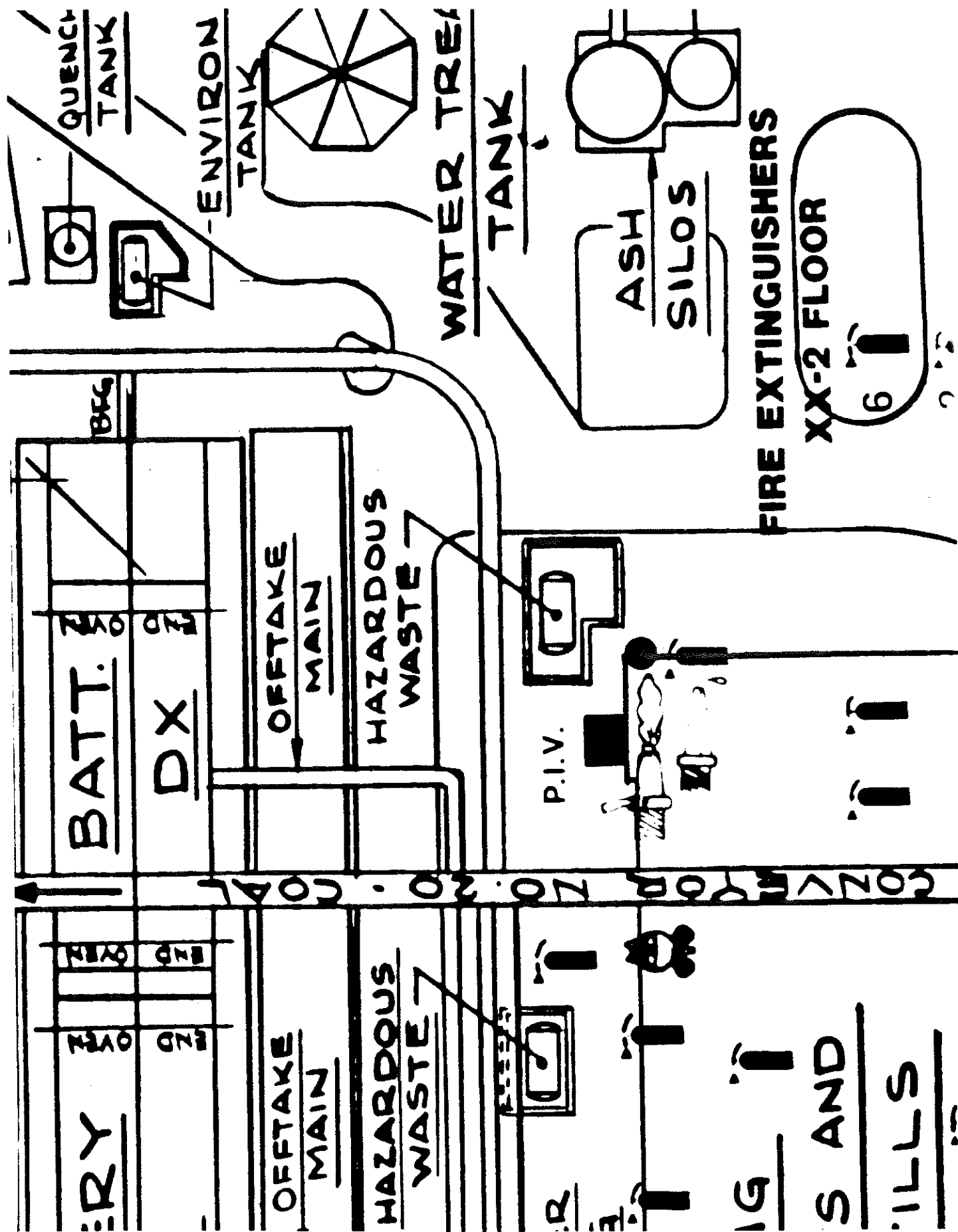
CONTINGENCY PLAN Coke Oven Drip Water

Coke oven gas line drips are collected in seven above ground (5,000 and 12,000 gallon) and five below ground tanks. Control of this waste thus relies on the integrity of the individual tanks and the piping system which carries the coke oven gas and which directs the resulting drip water to the collection tanks. This material is a clear, lightly colored liquid which is non-corrosive, non-flammable, and relatively non-toxic. The hazardous designation derives from the potential for release of toxic gases if mixed with highly acidic solutions.

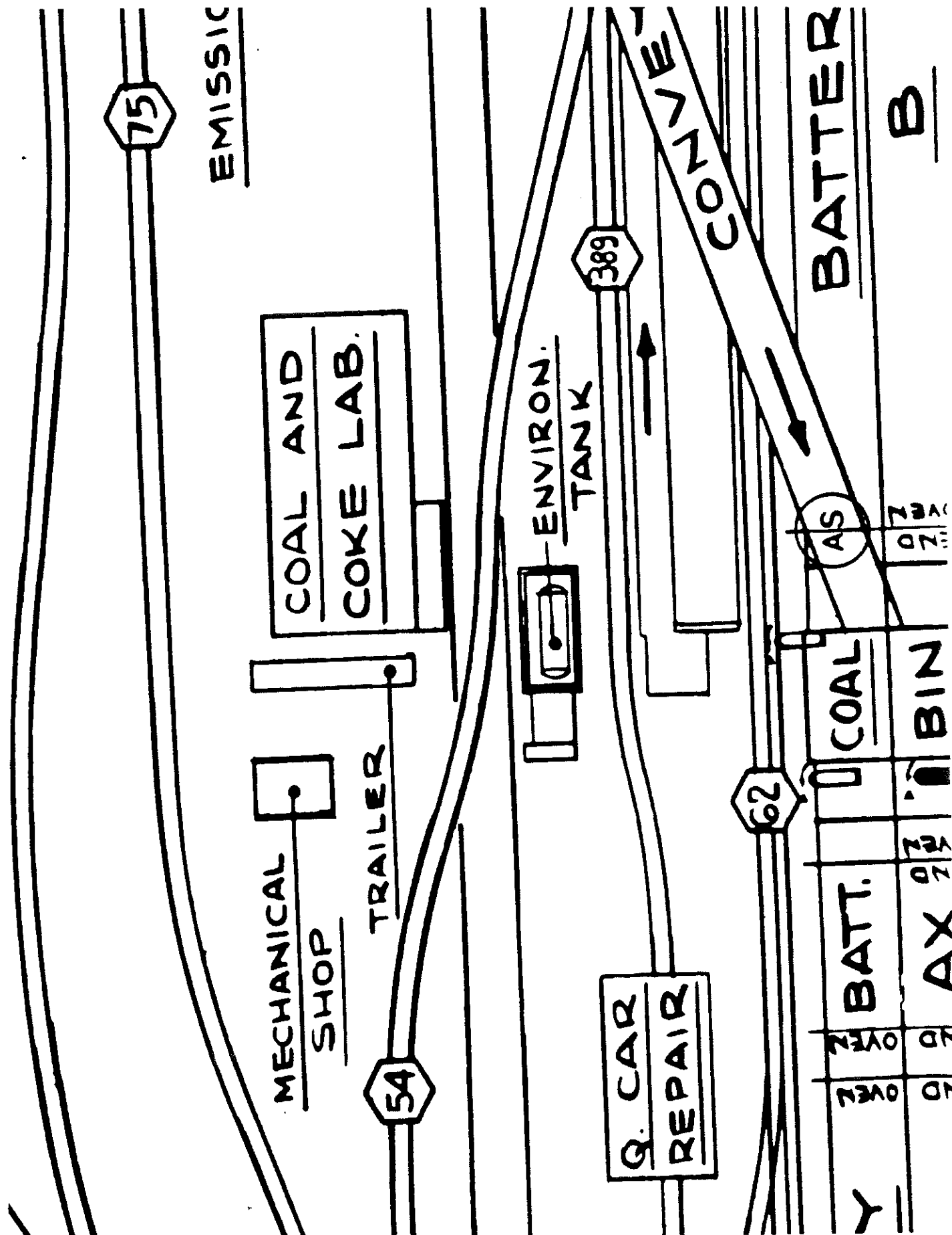
The piping system is monitored visibly by furnace patrol personnel a minimum of once per shift. These personnel are routinely equipped with the standard safety equipment of gloves, coveralls, hard hat, safety shoes, and safety glasses. In the event of a leak being observed, the patrol person will isolate the problem portion of the system by closing the appropriate valves. The volume of gas line drips in the piping system at any one time is very small. Leaks would be contained in a small volume of soil at the point of the leak. There is no source of acid within the gas line system, and consequently, there is no way for the hazardous characteristic of this material to be manifest.

The greater opportunity for uncontrolled release of this material is from the storage tanks because of the larger volume involved. The damage potential is minimized by all of the above ground tanks being within a lined dike capable of holding 150 percent of the tank volume. The liquid level in each underground tank is measured once per shift; preventing overfilling as well as an indication - based on historical experience - of any leakage from underground tanks. In the event of a rupture of an above ground tank, the furnace patrol would report it by telephone to their supervisor, who would initiate the general contingency plan. Telephones are located within 100 yards of each of the tanks. The ruptured tank would then be isolated from the system to avoid an overflow of the dike. Once again, the absence of any significant acid source in the vicinity of the storage tanks precludes the existence of critical environmental situation. A commercial waste hauler is on 24-hour call and would be directed to pump the material from the diked area and dispose of it in the quench tower wet well or, if necessary, off-site at an approved disposal facility.

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HAZARDOUS MATERIALS INVENTORY

Material: Final Cooler Water.

Type of Storage: Storage is on an in-process basis because of on-site disposal.

Location: WW Pump House

Method of Disposal: Deep-well injection on-site.

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Ovens - Final Cooler Water

Description

From Coke Oven gas final coolers;
normally disposed of by deep well
injection; pumped from Pump House
west of final coolers to deep well
east of Coal Road.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	90°C	-	No
. Corrosive	8.0	10.47	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	No Reaction	No
Caustic	-	No Reaction	No
Cyanide	940	-	Yes
Sulfide	220	-	Yes
Explosive	-	-	No
. Toxic			
Arsenic	0.002	0.1	No
Barium	0.05	0.001	No
Cadmium	0.02	0.1	No
Chromium	0.02	0.05	No
Lead	0.02	0.1	No
Mercury	0.0008	0.03	No
Selenium	0.002	0.1	No
Silver	0.01	0.3	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003 (Reactive: Cyanide/Sulfide)
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

DRAFT

Material:

Guide Number: 55

HEALTH HAZARDS

Poisonous; may be fatal if inhaled, swallowed or absorbed through skin.
Contact may cause burns to skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control water may give off poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Cylinder may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Ventilate closed spaces before entering them.
Wear **positive pressure** breathing apparatus and special protective clothing.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Fight fire from maximum distance.
Dike fire control water for later disposal; do not scatter the material.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material
and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container
and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin or eyes with running
water for at least 15 minutes.
Speed in removing material from skin is of extreme importance.
Remove and isolate contaminated clothing and shoes at the site.
Keep victim quiet and maintain normal body temperature.
Effects may be delayed; keep victim under observation.

*NOTE: This information is taken from the "1984 Emergency Response
Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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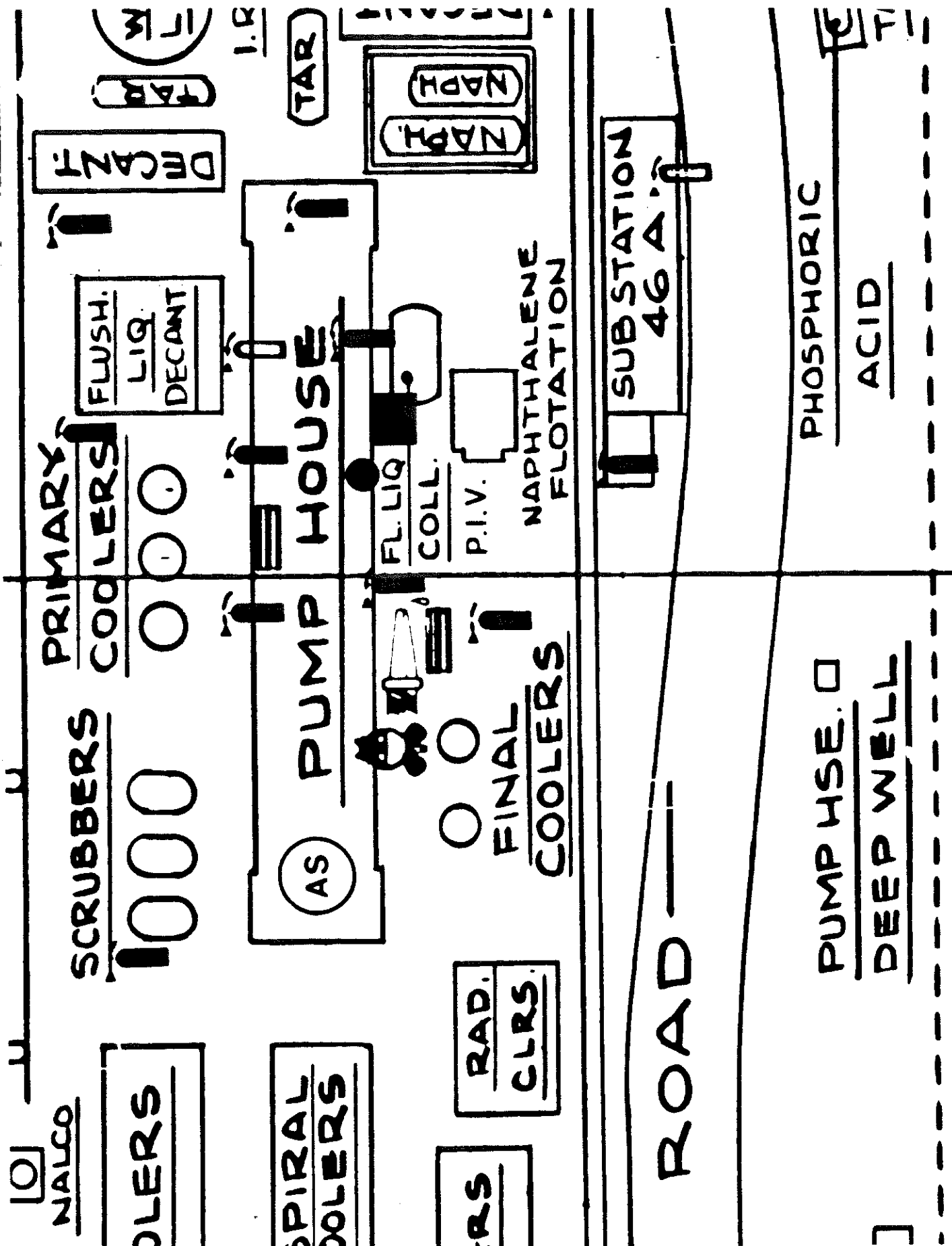
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CONTINGENCY PLAN
Final Cooler Water

This is a clear, colorless material with an odor of naphthalene or "mothballs." It is non-flammable, non-corrosive, and relatively non-toxic. Its hazardous designation derives from the potential for the release of toxic gases in acidic media. The material is disposed of on-site by deep well injection as it is generated. There is no storage system. There is an operator on duty at all times who visually inspects the integrity of the piping system. The operator also inspects the injection well pumphouse each hour.

In the event of a piping failure resulting in a spill of material, the liquid would travel to a drainage tunnel between WW and XX buildings. The material would be processed first in the AC Stills and finally in the treatment plant for removal of cyanide and phenol. The only hazard with respect to this material is the potential for generation of toxic fumes if mixed with an acidic solution. There is no significant source of acid in any of the areas where this material would potentially flow.

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HAZARDOUS MATERIALS INVENTORY

Material: Electric Furnace Dust

Type of Storage: Silo

Location: South end of Electric Arc Furnace Building

Method of Disposal: Removed by licensed hauler on a daily basis when furnace is in operation. Treated at a licensed treatment facility, and disposed of at a licensed disposal facility.

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Electric Furnace Dust

Description

Emission control dust from baghouse
from primary production of steel in
Electric Furnace.

This material is a dry, reddish
brown, odorless, powdery solid.

Hazardous Characteristics

	Lab #1	Lab #2	Hazardous ?
. Ignitable	90°C	-	No
. Corrosive	N.A.	12.4	No
. Reactive			
Unstable	-	-	No
Water		**	No
Acid		**	No
Caustic	-	-	
Cyanide	Non Reactive	-	No
Sulfide	Non Reactive	-	No
Explosive	-	-	
. Toxic Mg/l			
Arsenic	0.007	0.1	No
Barium	0.61	0.5	No
Cadmium	0.32	0.1	No
Chromium	0.10	0.1	No
Lead	0.75	7.0*	Yes
Mercury	0.0002	0.1	No
Selenium	0.016	0.1	No
Silver	0.02	0.1	No
Zinc	490.00	0.7	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous waste, solid, N.O.S. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	K061
. Other	Contains Lead and Zinc
. Hauler/ID	Michigan Disposal, Inc. MID000724831
. Disposer/ID	Michigan Disposal, Inc. MID00724831

*Greater than allowable concentration (5.0), Mg/l

Lab #1 1985

**No violent reaction

Lab #2 1986

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 32

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
May burn rapidly with flare-burning effect.

HEALTH HAZARDS

Fire may produce irritating or poisonous gases.
Contact may cause burns to skin and eyes.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, sand, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Magnesium Fires: Use dry sand, Met-L-X powder or G-1 graphite powder; **do not use water.**

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Do not touch spilled material.
Small Dry Spills: With clean shovel, place material into clean, dry container and cover; move containers from spill area.
Large Spills: Wet down with water and dike for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Electric Furnace Dust

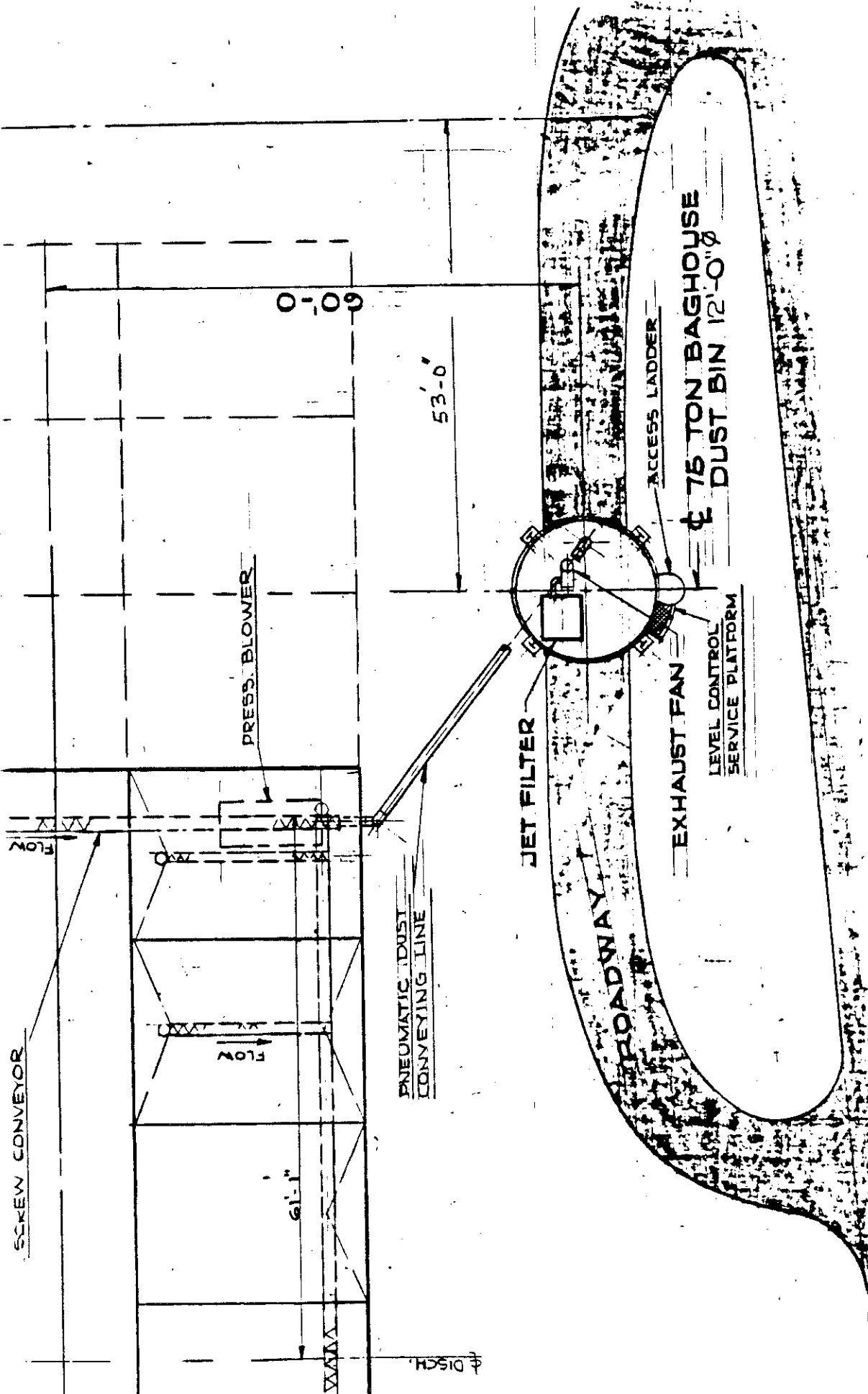
This material is a dry, reddish brown, odorless, powdery solid. It is non-flammable, non-corrosive, non-reactive, and relatively non-toxic. Its hazardous designation is derived generically, since most wastes generated from such a process exceed the Extraction Procedure Toxicity limits (EP toxicity). The extract concentrations will depend in large part on the characteristics of scrap material being fed to the system. A given sample may not exceed any of the hazardous waste characteristics. If there is an exceedance, it would be in the EP toxicity test, and the material is subsequently non-toxic in the dry condition.

A dust man is on duty at the storage silo whenever the electric furnace is operating and/or a disposal truck is being loaded. In the event of a spill, the dust man is to wet down the material to minimize windblown transport. A water tap and hose is located adjacent to the storage silo. Tarps may be obtained from the Crib in Building F-36 to cover the material. The dust man is to notify the Stock Receiving Supervisor who would in turn direct the outside contractor to remove the material to the off-site disposal area. Two front end loaders are available on-site at all times to assist in any clean-up activities. Shovels, hard hats, masks, respirators, and Self Contained Breathing Apparatus (SCBA) are available in the Crib which is located approximately 100 feet from the storage silo.

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PLAN

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HAZARDOUS MATERIALS INVENTORY

Material: Light Oil Muck
Type of Storage: 2 - 10,000 gallon tanks
Location: Coke oven area - east of Light Oil Building
Method of Disposal: Removed by licensed waste hauler

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Ovens - Light Oil Muck

Description

Coke oven gas is "washed" with wash oil to remove light oils. Light oils are removed from wash oil by distillation. Wash oil is decanted. The resulting sludge is transferred to light oil muck tanks at the Light Oil Plant for disposal by stabilization and landfilling.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	60°C	100°C	Combustible
. Corrosive	7.2	5.6	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	HC1	No
Caustic	-	N	No
Cyanide	0.15 mg/l	1.0	No
Sulfide	Negative	-	No
Explosive	-	-	No
. Toxic			
Arsenic	0.002	0.1	No
Barium	0.08	0.1	No
Cadmium	0.02	0.1	No
Chromium	0.06	0.1	No
Lead	0.02	0.1	No
Mercury	0.0002	0.1	No
Selenium	0.002	0.1	No
Silver	-	-	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous waste, liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003
. Other	Contains a trace of cyanide and benzene
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

DRAFT

Material:

Guide Number: 27

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

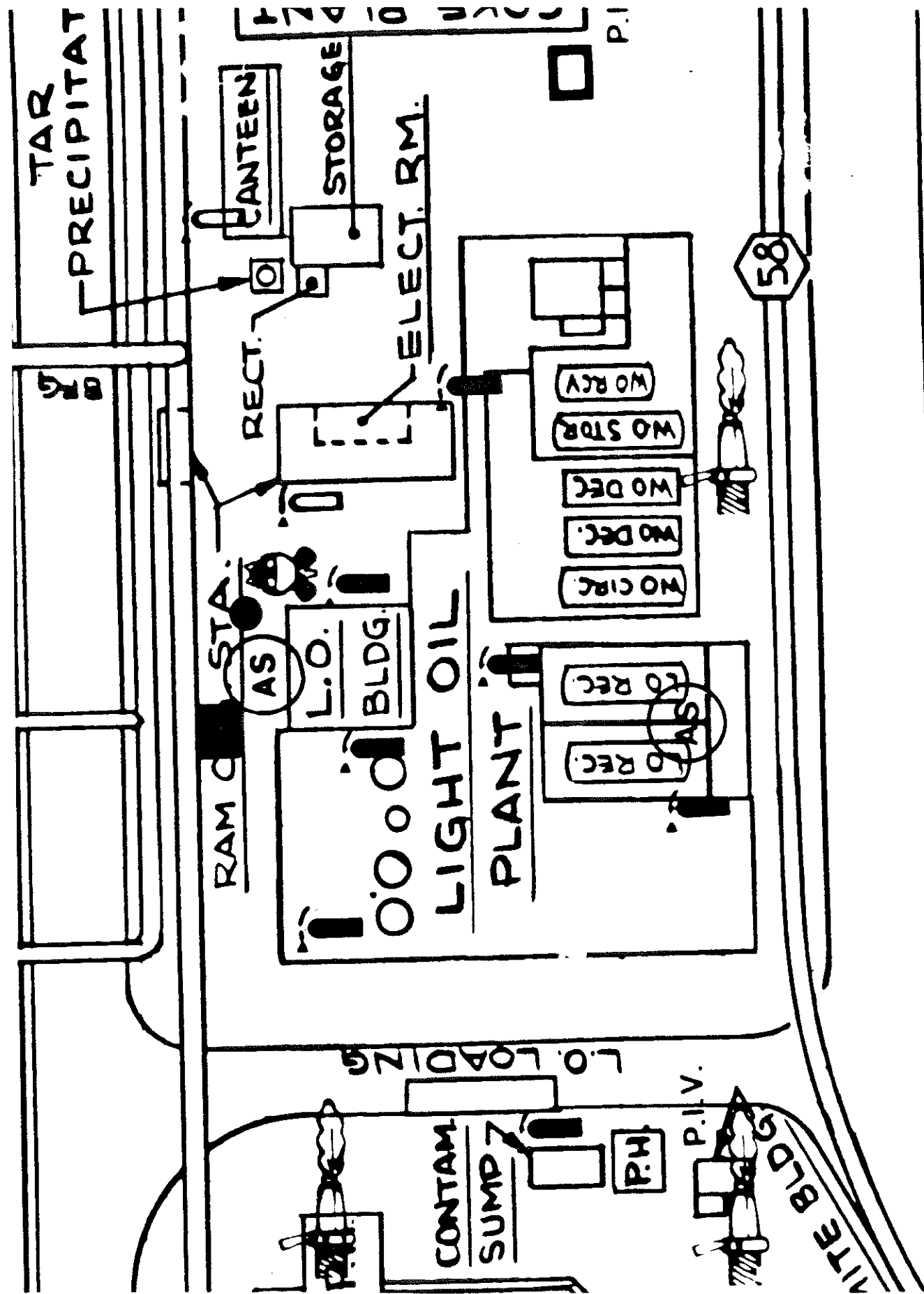
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CONTINGENCY PLAN
Light Oil Muck

This is a brownish-black, "oily" liquid with a coal-tar type odor. It is hazardous because it's ignitable. The muck tanks are contained within lined dikes. Any leaks would be contained and subsequently collected and disposed of by a licensed waste contractor.

In the event of fire, there is an alarm box located outside of the Light Oil Building, which is adjacent to the tanks. This alarm box signals the Dearborn Fire Department, which has been informed that this particular area requires foam apparatus for extinguishing fires. There are also three foam fire stations with hose reels located around the periphery of the tanks at a distance of 50 to 200 feet. These would be used by Light Oil personnel to try to contain any fire until the arrival of the fire department.



TRANS

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HAZARDOUS MATERIALS INVENTORY

Material:	Coke Oven - Tar Storage Sludge
Type of Storage:	Accumulates in Tar Storage Tanks until tanks are cleaned - material removed from site as cleaning is performed.
Location:	Tar Tank Farm South of Light Oil Plant
Method of Disposal:	Hauled by Licensed Hauler to Licensed Landfill

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Oven - Tar Storage Sludge

Description

Tar is collected from the flushing liquor decanter and pumped to tar storage tanks south of the light oil plant. Accumulated tar is pumped from these tanks to barges. Residual sludge from the tanks is normally disposed of by landfilling.

<u>Hazardous Characteristics</u>	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	-	138°C	No
. Corrosive	-	6.2	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	HCl	No
Caustic	-	NaOH	No
Cyanide	-	-	No
Sulfide	-	-	No
Explosive	-	-	No
. Toxic			
Arsenic	-	0.1	No
Barium	-	0.1	No
Cadmium	-	0.1	No
Chromium	-	0.1	No
Lead	-	0.1	No
Mercury	-	0.4	No
Selenium	-	0.2	No
Silver	-	0.1	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, solid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	K087
. Other	Contains Phenol and Napthalene
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

27

Material:

Guide Number: 27

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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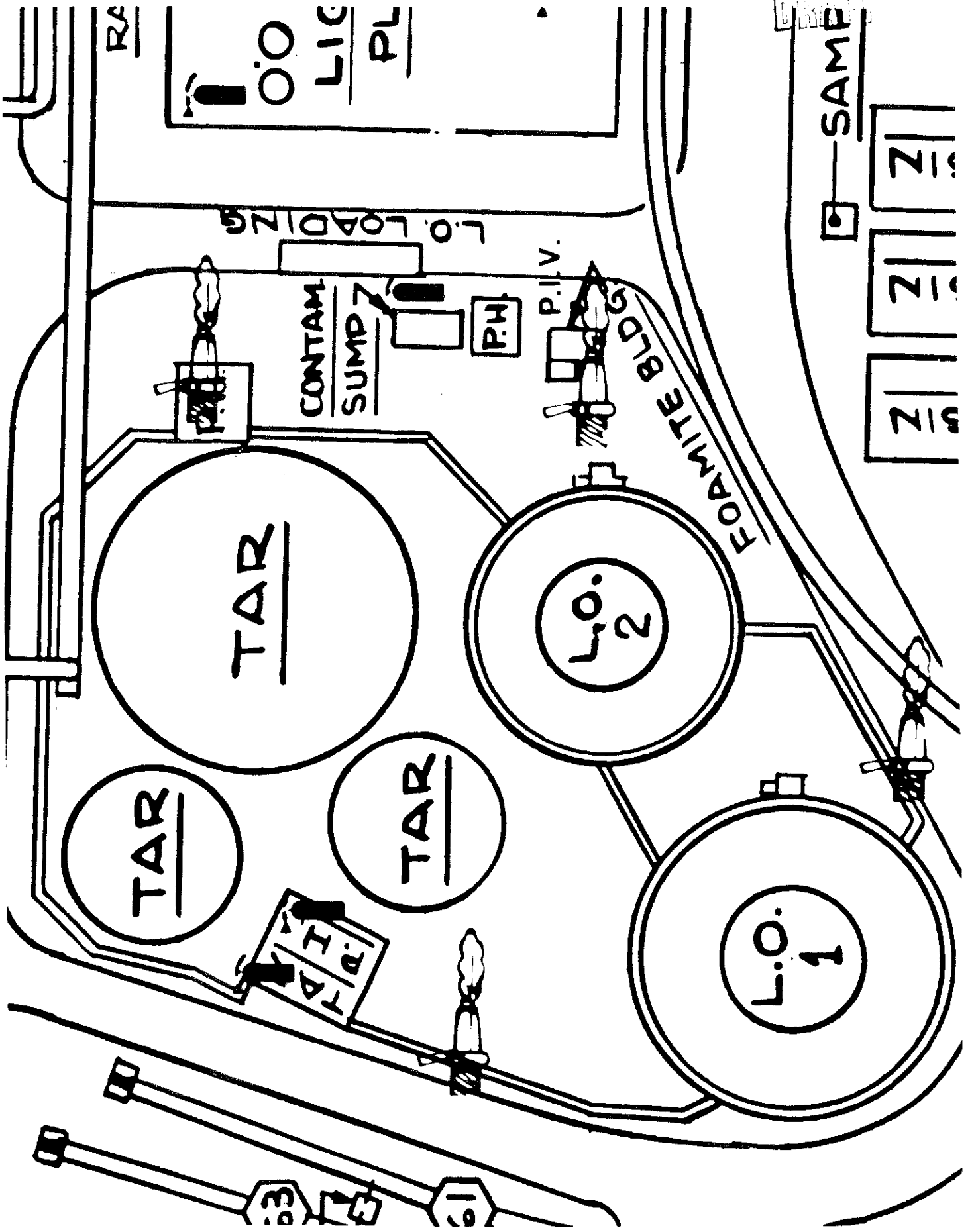
CONTINGENCY PLAN
Coke Oven Tar Sludge

This material accumulates in the tar storage tanks and must be disposed of when these tanks are cleaned. The three storage tanks are cleaned once every three to six years. The material is essentially a pasty mixture of tar and coke breeze.

The storage tanks themselves are in a diked area, thus there is essentially no way that the residual sludges remaining after the tar is removed could escape from the system. The only risk involved in this material is the possibility of its being ignited. There are foam nozzles inside the tanks to control any fire which might occur prior to the sludge being removed. There is also a foam hose immediately outside the Tar Pumphouse which is adjacent to the tanks, which would be used in case of a fire outside of the tanks.

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HAZARDOUS MATERIALS INVENTORY

Material: Mineral Spirits
Type of Storage: Self-Contained Cleaning Systems; Service
by Outside Contractor

Location:

	<u>SHOP LOCATION</u>	<u>BRAND NAME</u>	<u>NO. OF UNITS</u>
Hi-Lo	OH 36	SK*	1
	OH 41 North	SK	1
	OH 41	DC**	1
	OH 41 South	SK	1
Cold Mill Hi-Lo Shop	Y72	SK	1
J-9 Instrument	Instrument Shop	Rotunda	1
J-9 Electrical	H17 (Mezzanine)	Rotunda	1
J-9 Crane Repair	H-19 (Second Floor)	Rotunda	1
J-9 Machine Shop	C24,25 North	RS***	1
J-9 Machine Shop	D14 South	SK	1
J-9 Paint Shop	Warehouse	SK	1
Hot Strip Mill	H78, B54, G32	SK	3

*SK-Safety Kleen

**Dyna Clean

***Fabricated by Rouge Steel

Method of Disposal: Recycled by Licensed Hazardous Waste
Disposal Facility

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Mineral Spirits (Petroleum Naptha)

Description

Maintenance areas at the Coke Ovens and J-9 Shops (Main, Warehouse, Hi-Lo Garage) use parts washers containing mineral spirits. This material is handled by Safety-Kleen. (See attached sheet for specific locations)

Hazardous Characteristics

Lab #1*
105°F

Lab #2

Hazardous ?
Combustible

. Ignitable

. Corrosive

. Reactive

Unstable

Water

Acid

Caustic

Cyanide

Sulfide

Explosive

. Toxic

Arsenic

Barium

Cadmium

Chromium

Lead

Mercury

Selenium

Silver

N/A

No
Stable

-

-

-

-

-

-

-

-

-

-

-

-

-

-

No

No

No

No

No

No

No

No

No

No

No

No

No

No

No

No

No

*MSDS - Safety Kleen

Transportation Information for Contaminated Clean Up Material

. DOT Name

. Hazard Class

. Hazardous Waste Number

. Other

. Hauler/ID

. Disposer/ID

Waste Petroleum Naptha (UN1255)

Combustible

D001

Environmental Waste Control

MID057002602

Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

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FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Mineral Spirits

Mineral spirits is used as a degreasing fluid, paint brush cleaner and all-around oily parts cleaner. Most tanks holding mineral spirits are owned and maintained by the Safety-Kleen Company. Other tanks, Rotunda-type or Rouge Steel fabricated, are maintained by Safety-Kleen.

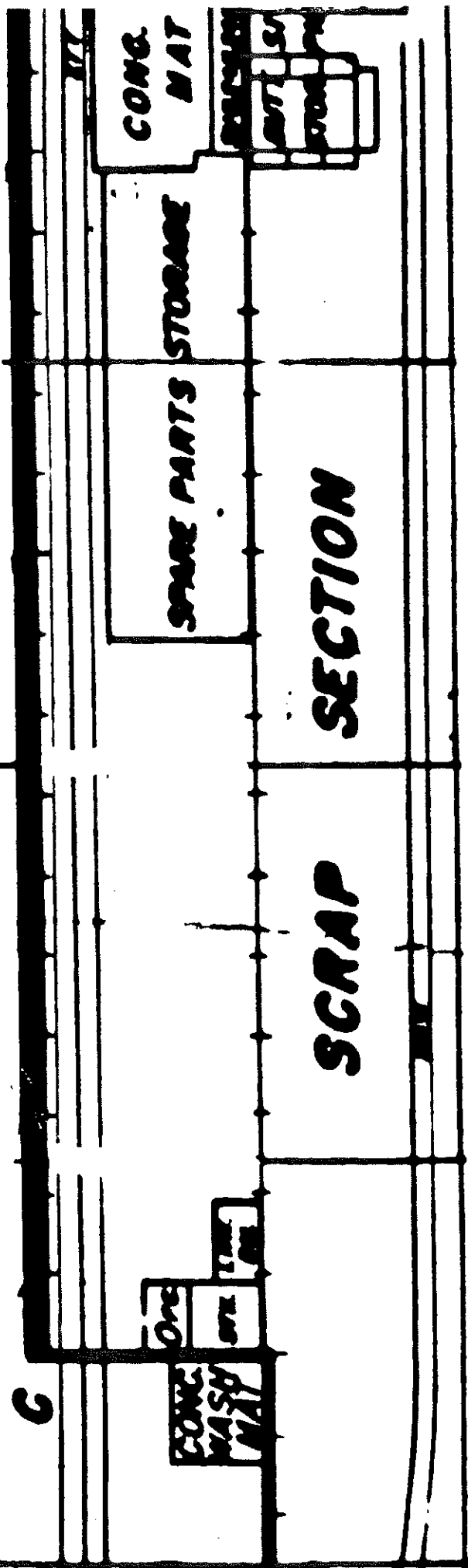
Spilled material is to be contained; held in one place and prevented from entering sewers or confined spaces. Collect this material with pumps or vacuum systems and return it to the original container. If absorbents must be used, put the wet absorbent material in a drum and mark as "Hazardous Waste, solid, n.o.s. - NA9189, ORM-E."

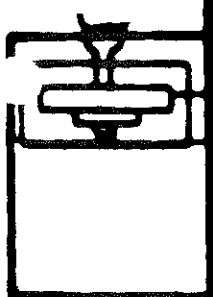
If the mineral spirits system is damaged - leaking reservoir, drum or tub, contain the spill and pump liquid mineral spirits to a clean holding drum. Absorbed mineral spirits should be handled as above. Notify Safety-Kleen to come out and repair their system. They should pump out the holding drum and return the mineral spirits to their site for reclamation.

Notify Security immediately of all mineral spirits spills.

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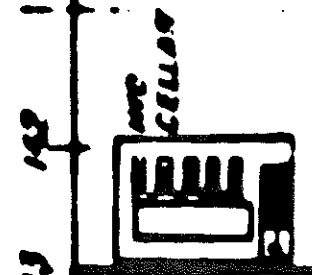
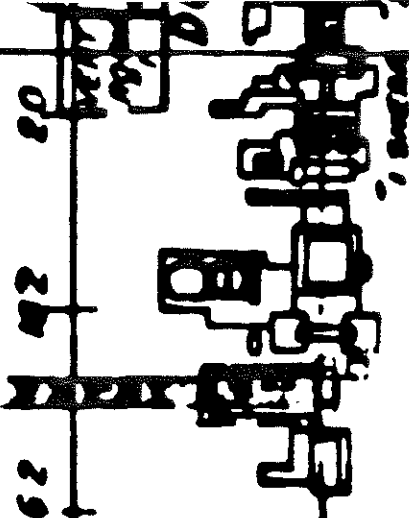


COMPRESSOR
SUB 12-C

COMPRESSOR
ROOM
ADDITION

34

H



MCC
CELLAR

9 10 11 12 13 14 15 16 17 18 19 20

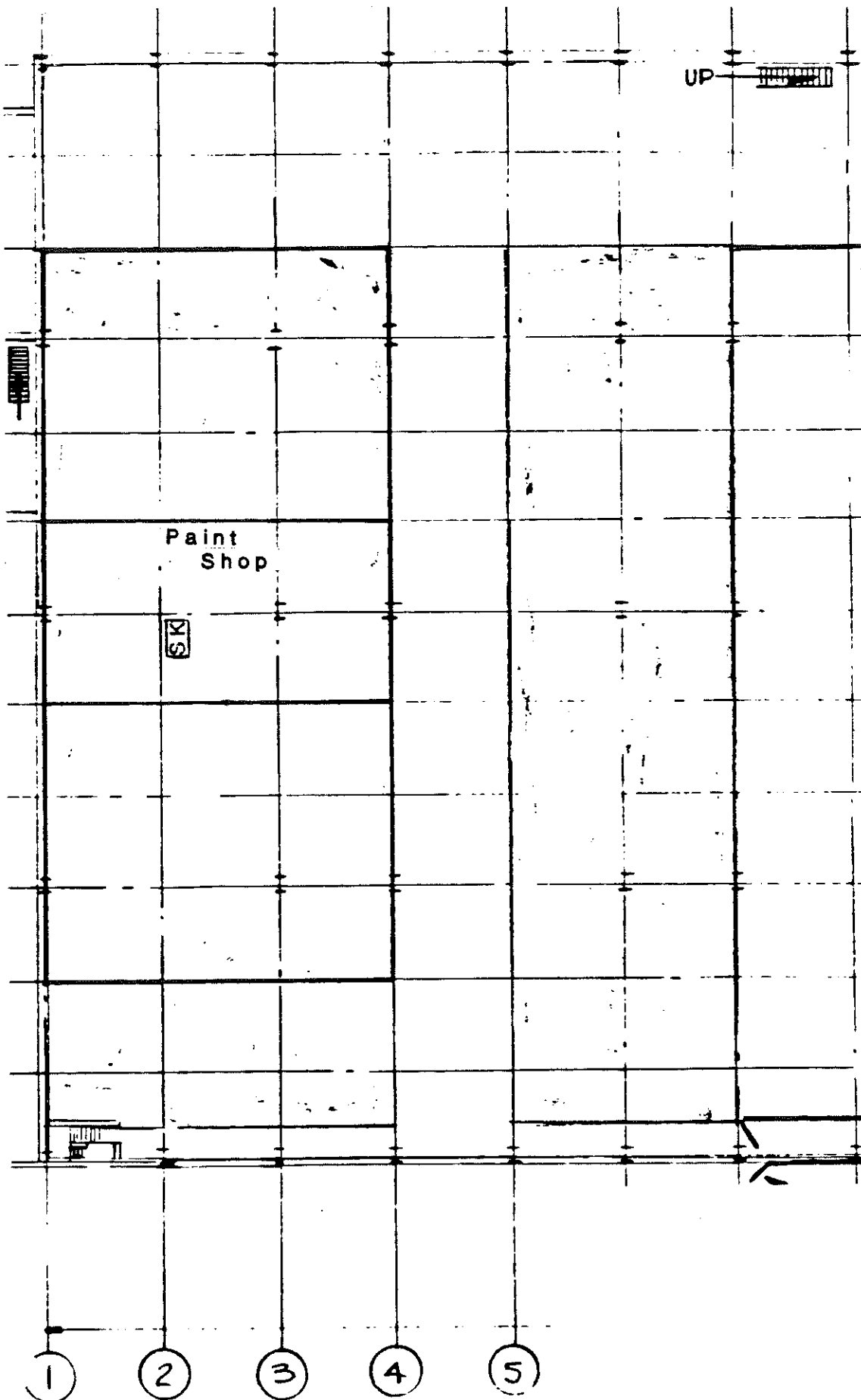
TOILET

SUB 246-247

TRANS

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A



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J-9 Shops

Paint Shop at ROW

68" HOT STRIP MI

W3437.5 COL. 80

EL. 106.31

12" C.I.

I.E. 103.18

10" C.I.

EL. DUCT MH. T/EL. 109.0
T/EL. 101.0 N1064.0
B/EL. 97.92 W3425.0

ELECT. MH. 240
N1000.0

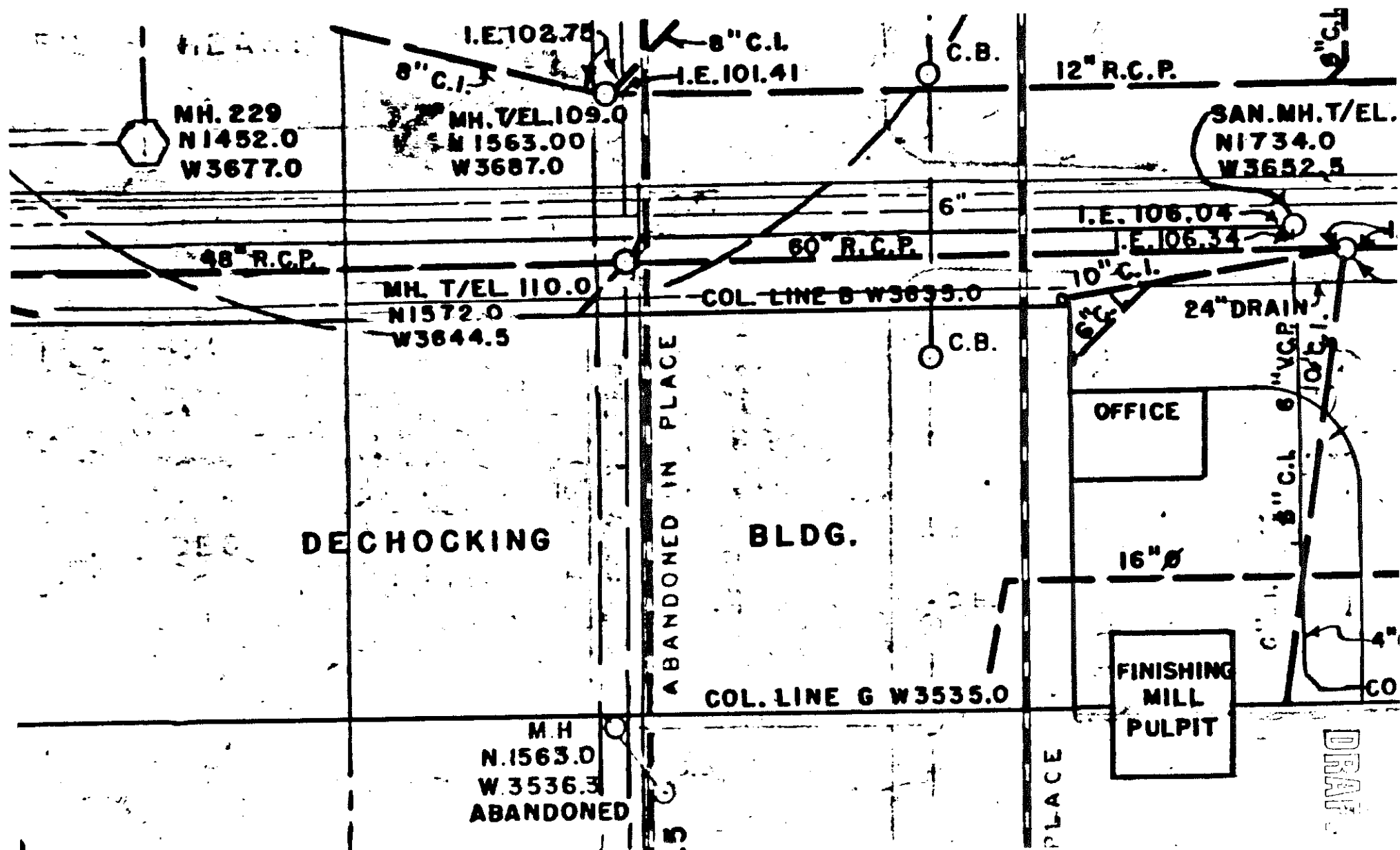
4" V.G.P.
SAN.

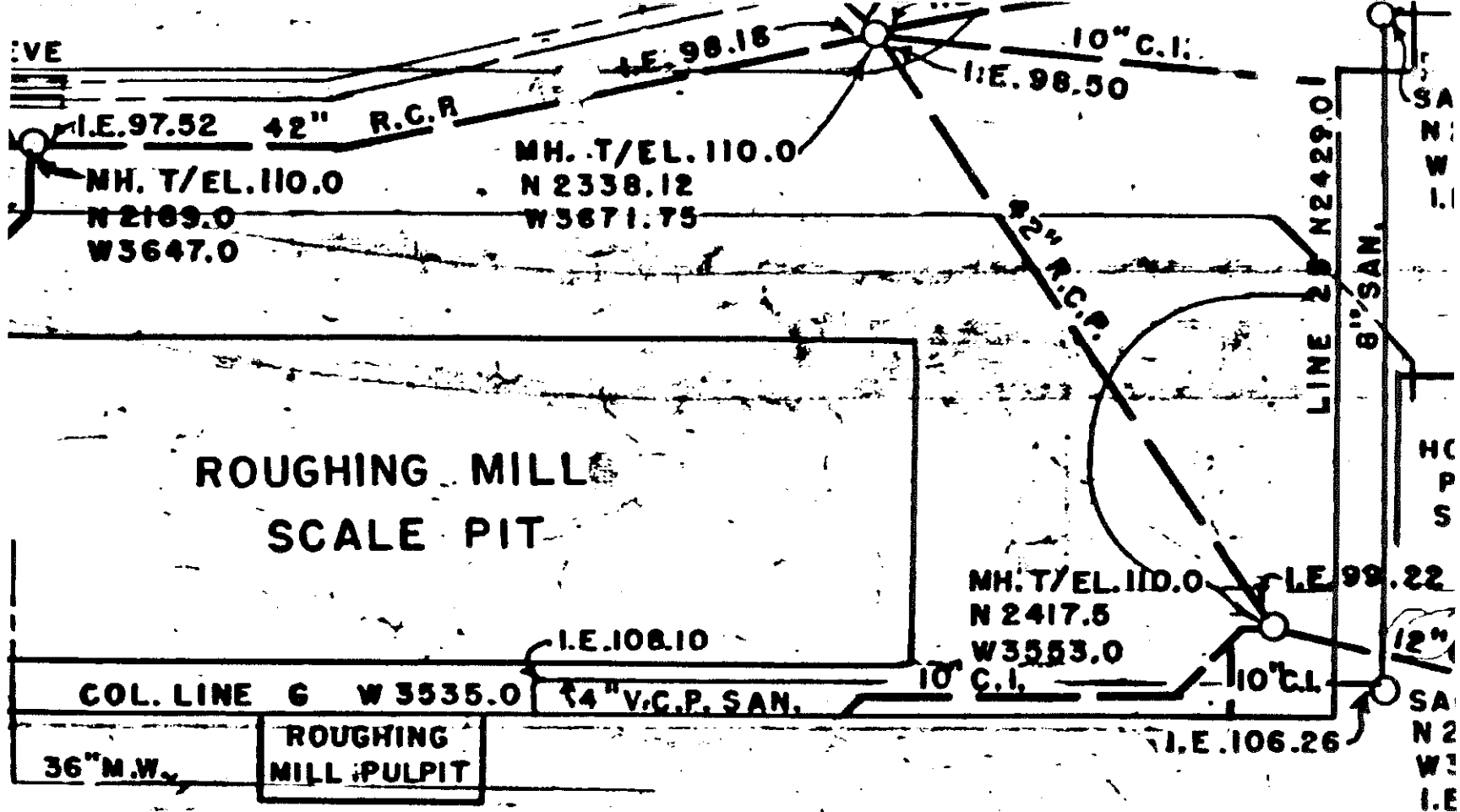
COL. 78

COL. LINE J W339

R.C.P.

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68" HOT STRIP MILL W 3475.0

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HAZARDOUS MATERIALS INVENTORY

Material: Waste Pickle Liquor

Type of Storage: 3 - 40,000 gallon above ground rubber lined tanks, underlain by 5 feet of limestone.

Location: Pickle Acid Tank Farm, West of Steel Mills, F56.

Method of Disposal: Removed by commercial vendor at a rate of approximately one million gallons per month.

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Pickle Liquor

Description

This material is used as a surface treatment for finished steel. When wasted from the pickling tanks, it is stored in above ground tanks between the Steel Mill Plant and Slab Handling Yard.

Hazardous CharacteristicsLab #1Lab #2Hazardous ?

. Ignitable	90°C		No
. Corrosive	1		Yes
. Reactive			
Unstable	-		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	0.29		No
Sulfide	9.1		No
Explosive	-		No
. Toxic			
Arsenic	0.345	0.1	No
Barium	0.05	0.1	No
Cadmium	0.02	0.1	No
Chromium	17.0	4.3	Yes
Lead	6.4	0.1	Yes
Mercury	0.004	0.03	No
Selenium	0.240	0.1	No
Silver	0.18	0.3	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste Acid, liquid, n.o.s. NA1760
. Hazard Class	Corrosive Material
. Hazardous Waste Number	K062
. Other	Contains Chromium (D007) and Lead (D008)
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

Revision:

Date:

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

DRAFT

Material:

Guide Number: 60

HEALTH HAZARDS

Contact causes burns to skin and eyes.
If inhaled, may be harmful.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Flammable/poisonous gases may accumulate in tanks and hopper cars.
Some of these materials may ignite combustibles (wood, paper, oil, etc.).

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Some of these materials may react violently with water.
Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
Remove and isolate contaminated clothing and shoes at the site.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Keep victim quiet and maintain normal body temperature.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN Waste Pickle Liquor

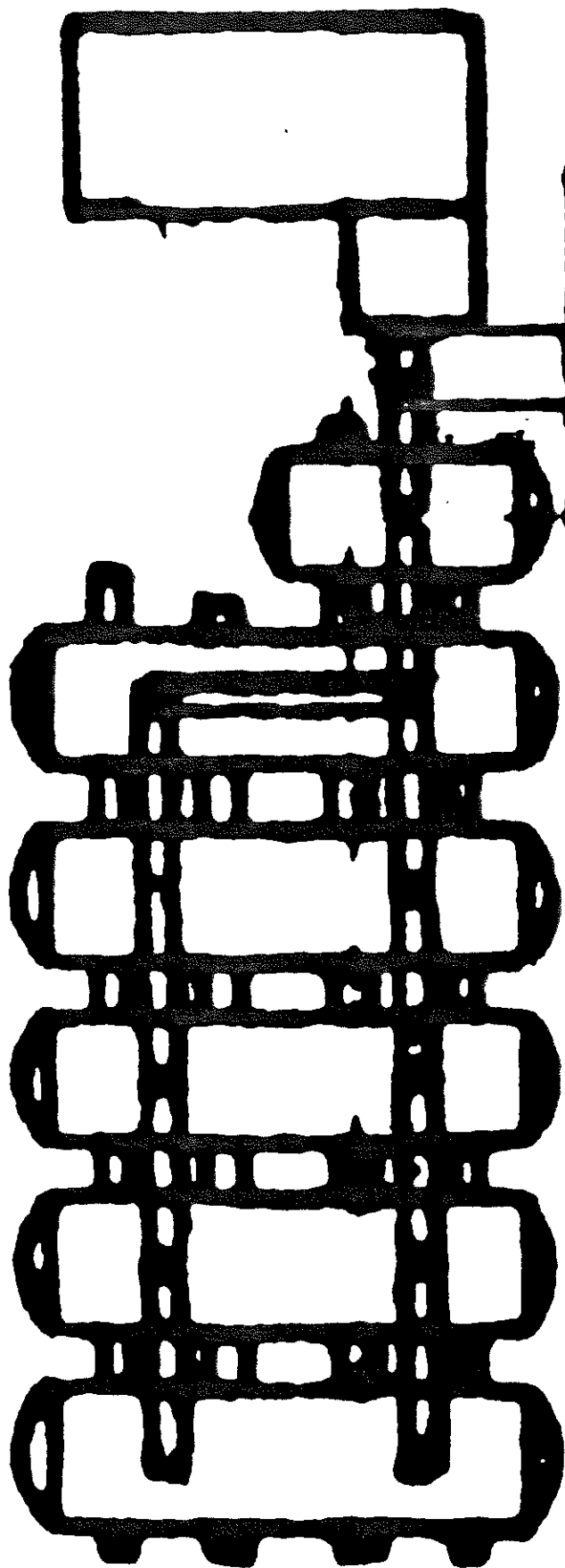
The waste pickle liquor is a non-flammable, greenish liquid with an acidic odor, which is stored in three 40,000 gallon above ground, rubber lined steel tanks. These tanks, along with two similar sized tanks of fresh hydrochloric acid and a smaller tank of caustic soda, are underlain by a five foot deep bed (approximately 4,000 tons) of limestone. Assuming the limestone is 75 percent CaCO_3 , this quantity is theoretically capable of neutralizing approximately 800,000 gallons of pure hydrochloric acid, and thus sufficient to neutralize leaks from this system.

The acid Tank Farm is located West of the Steel Mills, Building F56. As such, it is physically isolated by both distance and the boat slip, from those wastes on-site which can generate toxic fumes when in an acidic solution. The facility is equipped with six dosing showers, two eye wash stations, and two fire extinguishers. Immediately adjacent to the tanks is the attendant's office, within which are found tank level gauges, telephone, two self-contained breathing apparatuses (SCBA), hard hat with face shield, acid gloves, and shovels.

There is a Tank Farm attendant on duty twenty-four hours per day. In the event of a major spill, he would first call the foreman, who would initiate the general contingency program. If the spill were to prevent the attendant from entering the office, there are two additional telephones within 100 yards of open area that could be used. As noted above, the Tank Farm is underlain by a bed of limestone sufficient to hold and neutralize the total contents of the Tank Farm. Should a small amount of the acidic material be splashed outside the limitations of the bed, a high volume hose is available to flood the surrounding area with water. The neutralized material would flow to the Schaefer Road Treatment Facility by means of existing sewers, and would ultimately discharge from the Treatment Plant outfall.

Any limestone losses resulting from a spill will be replaced by a stock of fresh limestone located approximately 50 yards from the Tank Farm. A front end loader is available from the Coke Plant, which could be brought to the Tank Farm within 10 to 15 minutes.

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HAZARDOUS MATERIALS INVENTORY

Material:	Waste Halogenated Solvents
Type of Storage:	DOT Approved Drums
Location:	Powerhouse (1, 1, 1 Trichloroethane) Oxygen Plant (Methylene Chloride)
Method of Disposal:	Licensed Hauler as Needed; Sold for Reclaim

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

1, 1, 1 Trichloroethane

Description

Power House maintenance shop uses this material in a vapor degreaser for parts cleaning. As the solvent becomes laden with oily sludge, the unit is cleaned out. Waste material is stabilized and landfilled.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	-		No
. Corrosive	-		No
. Reactive			
Unstable	-		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	-		No
Sulfide	-		No
Explosive	-		No
. Toxic			
Arsenic	-		No
Barium	-		No
Cadmium	-		No
Chromium	-		No
Lead	-		No
Mercury	-		No
Selenium	-		No
Silver	-		No

Note: This is a specifically listed waste.

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste 1, 1, 1 Trichloroethane (UN2831)
. Hazard Class	ORM-A
. Hazardous Waste Number	F002
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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Date:

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ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Methylene Chloride

Description

Oxygen Plant uses this material in a dip degreaser for parts cleaning. As the solvent becomes laden with oily sludge, the unit is cleaned out. Waste material is stabilized and landfilled.

Hazardous CharacteristicsLab #1Lab #2Hazardous ?

. Ignitable	-		No
. Corrosive	-		No
. Reactive			No
Unstable	-		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	-		No
Sulfide	-		No
Explosive	-		No
. Toxic			No
Arsenic	-		No
Barium	-		No
Cadmium	-		No
Chromium	-		No
Lead	-		No
Mercury	-		No
Selenium	-		No
Silver	-		No

Note: This is a specifically listed waste.

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste Methylene Chloride (UN1593)
. Hazard Class	ORM-A
. Hazardous Waste Number	F002
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

DRAFT

Material:

Guide Number: 74

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Exposure in an enclosed area may be very harmful.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Most vapors are heavier than air.
Container may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical or CO₂.
Large Fires: Water spray, fog or foam.
Stay away from ends of tanks.
Cool containers that are exposed to flames with water from the side until well after fire is out.

SPILL OR LEAK

Stop leak if you can do it without risk.
Shut off ignition sources; no flares, smoking or flames in hazard area.
Small Liquid Spills: Take up with sand, earth or other noncombustible absorbent material.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
Remove and isolate contaminated clothing and shoes at the site.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Use first aid treatment according to the nature of the injury.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Halogenated Solvents

Two halogenated solvents are used on site. The Power House maintenance area uses 1, 1, 1, Trichloroethane in its vapor degreaser. Methylene chloride is used as a dip cleaner in the Oxygen Plant.

Spills and leaks are to be contained; prevented from entering sewers or confined spaces. Contained liquids are to be pumped into clean drums and marked as hazardous waste: either

Waste 1, 1, 1 Trichloroethane - UN 2831, ORM-A, F001

or Waste Methylene Chloride - UN 1593, ORM-A, F001

If absorbent is used to contain the spill, the contaminated absorbent must be disposed of as hazardous waste. Place contaminated absorbent in a drum and label the drum:

"Hazardous Waste, solid, n.o.s. - NA9189, ORM-E, F001"

Add to the label and shipping papers the note:

"Contains 1, 1, 1 Trichloroethane"

or "Contains Methylene Chloride"

Notify Security immediately of any spills of these materials.

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING PROGRAM

Annual hazardous waste management training is required for all Rouge Steel employees who:

- . Handle hazardous waste
- . May handle hazardous waste
- . Supervise hazardous waste handlers
- . Bear responsibility for compliance with Hazardous Waste Regulations

Training is intended to comply with 40 CFR 262.34 (a) 4, 40 CFR 265 Parts C and D, and 40 CFR 265.16

Employees requiring annual training receive one hour of classroom training and general hazardous waste management and a handout with information specific to wastes encountered by each employee. A video tape of the classroom training is available (January, 1987) for employees to use as a refresher (voluntary) and as primary training for new employees and transfers.

Classroom training is developed and conducted by Rouge Steel Environmental Control personnel. The Training Program includes:

- . General environmental awareness
- . Company commitment to compliance
- . General hazard information and precautions
- . Specific information on handling each waste in emergency situations.

It is the intent of the program developers to provide more than the functional training required by regulation. The training should acquaint Rouge Steel employees with the connection between complying with regulations and the quality of their lives at work and at home. Compliance will be most readily and consistently achieved when all employees understand that compliance is in the best interests of the Company and its employees.

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING LIST

GENERAL OFFICE

President
Vice President-Industrial Relations
Vice President-Engineering & Facilities
Vice President-Operations
Manager-Mfg & Environmental Engrg.
Manager-Environmental Control
Senior Environmental Engineer (3)
Environmental Control Engineer (4)

IRON MAKING OPERATION

Manager-Operations
Superintendent-Coke Ovens & By Products
Gen Supervisor-Oven Operation (4)
Supervisor-Ovens (10)
Gen Supervisor-Coal & Coke Handling
Supervisor-Yard Labor (1)
Gen Supervisor-By Products Operation (1)
Supervisor-By Products (4)
Supervisor - Gas Dept. (1)
Engineer-Steel Ops (1)
Super-Coke Ovens & By Prod Maint
Gen Supv-Environmental & Coke Ovens
Elec/Mech Maint (1)
Supv-Coke Ovens Maint (4)
Gen Supv-Coal Coke & By Products &
Projects Maint
Supv-Relief Maint. (2)
Supv-By Products Maint (1)
Supv-Coal & Coke Maint (1)

MELTING OPERATIONS

Manager-Melting Operations
Asst Mgr-Melting Operations
Super-Electric Furnace (1)
Gen Supv-Electric Furnace (1)
Supv-Melter (4)
Engineer-Steel Operations (1)
Superintendent-Maintenance (1)
Gen Supv-EAF Maintenance
Supv-Electric Furnace (4)

FINISHING OPERATIONS

Manager-Finishing Operations
Super-Hot Mills Maintenance (1)
Gen Supervisor-Mechanical (2)
Supervisor-Mechanical (8)
Superintendent-Cold Mills (1)
Gen Supv-Cold Rolling/Pickling (1)
Supervisor-Pickling (6)

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INDUSTRIAL RELATIONS

Vice President- Industrial Relations
Manager-Hourly Personnel & Labor Rels Dept
Section Supv-Industrial Safety & Fire
Protection (1)
Office Clerk A
Safety Engineer Sr (3)
Safety Engineer B
Administrative Coord
Fire Prot Specialists (5)

POWER & UTILITIES

Manager-Operations
Superintendent-Production
Gen Supv-Oxygen Plant (1)
Supervisor-Oxygen Plant (3)
Mechanical Distribution & Maint
Gen Supv-Mech Maint (1)
Supv-Mech Maint (3)
Supv-Misc Shops (1)
Gen Supv-Mech Distr & Maint (1)
Supervisor-Mech Dist (4)
Supervisor-Mech Maint (1)

MISCELLANEOUS SHOPS

Superintendent-Misc Shops
Divn Maint Engr
Gen Supv-Crane & H1-Lo Repair Shops (1)
Supv-Crane Repair (5)
Supv-H1-Lo Shop (4)
Gen Supv-Electrical Shops (1)
Supv-Instrument Shop (4)
Supv-Carpenter Shop (1)

MARINE OPERATIONS

Superintendent-Marine Operations

ENVIRONMENTAL COORDINATORS

Basic Oxygen Furnace
Blast Furnace
Coke Ovens
Cold Mill
Electric Arc Furnace
Hot Strip Mill
Power House
Roll Shops
Slabbing Mill
Continuous Casting

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING LIST

	Occ No.	Occupation Title	Maximum Crew Size		
			1	2	3
CRANE REPAIR - Dept. 1731	16	Millwright Apprentice	V	V	V
	50	Millwright Mechanic	5	18	5
	71	Millwright Apprentice	V	V	V
COLD MILL MAINTENANCE Dept. 1734	32	Plumber - Pipefitter	2	2	2
	37	Mill Maintenance	2	2	2
	68	Mill Maintenance	10	14	10
68" H.S.M. ASSIGN. MAINT. Dept. 1736	60	Mill Maintenance	0	1	0
	80	Mill Maintenance	0	1	0
	85	Electrician	0	1	0
ELECTRIC FURNACE MAINT. Dept 1743	50	Electrician	2	5	2
	51	Plumber-Pipefitter	2	2	2
	52	Millwright	3	6	3
	53	Welder-General	2	2	2
	54	Oiler	0	2	0
	55	Hydraulic Repair	1	1	1
PICKLING GENERAL Dept. 3650	37	Acid Tank Attendant	1	1	1
	60	Cleaner General #3 Pit & Sump	2	2	2
	61	Cleaner-Gen. Dept. Laborer Gr #2	4	4	4
	77	HCL Acid Farm Attendant	0	1	0
POWER - GENERAL Dept. 6701	15	Cleaner-General	0	10	0
	16	Cleaner-P.H. Utility	12	12	12
	17	Cleaner-P.H. Util. Leader	1	1	1

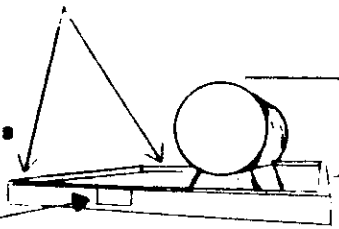
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ELECTRICAL MAINTENANCE Dept. 6711	10	Cleaner-Lamp	0	1	0
MECHANICAL MAINTENANCE Dept. 6712	29	Water Purification System Maint.	0	1	0
	33	Machinist-All Around-Power House	0	9	0
	34	Machinist-All Around-Power House-DR	0	1	0
	36	Millwright	0	6	0
	37	Millwright-Leader	0	1	0
	56	Painter-Glazier-Leader	0	1	0
	57	Painter-Glazier	0	7	0
	58	Painter-Sign	0	1	0
MECHANICAL CONSTRUCTION & MAINTENANCE - Dept. 6717	33	Machinist-All Around-Power House	0	8	0
	34	Machinist-All Around-Power House-DR	0	2	0
	36	Millwright	0	1	0
	63	Plumber-Pipefitter-Apprentice	0	V	0
	66	Millwright Apprentice	0	V	0
WATER TREATMENT Dept. 6729	13	First Class Oper-Power House 1	1	1	1
	15	Second Class Oper-Power House #1	2	2	2
	61	Stationary Steam Apprentice	V	V	V
OXYGEN PLANT - Dept 6738	10	Power Serv-Heat, Steam, Air & Water	4	4	4
	11	Power Serv-Heat, Steam, Air & Water Ldr	1	1	1
	61	Stationary Steam Apprentice	0	1	0
TRANSMISSION & DIST. GEN'L Dept. 6740	15	Cleaner-General	0	9	0
	16	Cleaner-Power House-Utility	0	10	0
	17	Cleaner-Power House-Utility-Leader	0	1	0
ELECTRICAL DISTRIBUTION Dept. 6743	07	Power Electrician	0	2	0
	23	Power Electrician- Leader	0	1	0

COKE OVENS YARD LABOR	30	Sprayer	0	1	0
Dept. 7030	33	Sump, Tank, Trench Cleaning	0	12	0
	34	Sump, Tank, Trench Cleaning-Leader	0	3	0
	50	Labor	2	9	2
	51	Labor-Utility	0	1	0
	56	Sweeper, Cleaner & Janitor	1	8	1
	58	Washer-Window (Scaffold)	0	2	0
COAL CHEMICAL-GENERAL	35	Apparatus Operator	2	3	2
Dept. 7250	45	Engineer-Licensed	1	2	1
COAL CHEMICAL-TAR	40	Light Oil Operator	0	1	0
Dept. 7251					
COAL CHEMICAL-CRUDE	25	Light Oil Operator	1	2	1
LITE OIL - Dept. 7252					
COAL CHEMICAL AMMONIUM	11	Sulphate Operator-Relief	1	1	1
SULPHATE - Dept. 7253	15	Sulphate-Operator	1	1	1
	30	A.C. Still Operator	1	1	1
COAL CHEMICAL NAPHTHALENE	10	Naphthalene Operator	1	1	1
Dept. 7255					
COAL CHEMICAL-MIXED GAS	45	Engineer-Licensed	2	2	2
DISTRIBUTION - Dept. 7260					
MIXED GAS DISTRIBUTION	11	Gas Dispatcher	1	1	1
SERVICE - Dept. 7261	22	Furnace Patrol	2	6	2
COAL CHEMICAL SULPHATE	31	Sulphate Dryer Operator-Leader	0	1	0
BAGGING - DEPT. 7270					

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Containment Dike Intact Tank Condition:



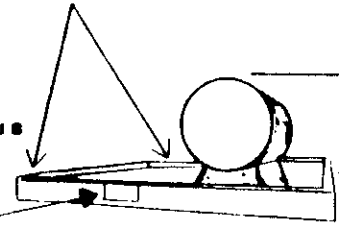
Hazardous Waste Signs at Approaches

Signs of Leaks

Storm Water Accumulation in Diked Area

Gas Line Drip Water Tank
XX Bldg-N

Containment Dike Intact Tank Condition:



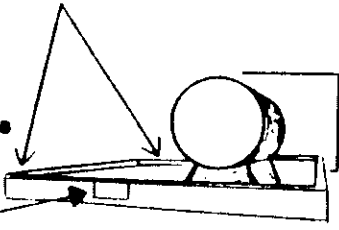
Hazardous Waste Signs at Approaches

Signs of Leaks

Storm Water Accumulation in Diked Area

Gas Line Drip Water Tank
Coal & Coke Lab

Containment Dike Intact Tank Condition:



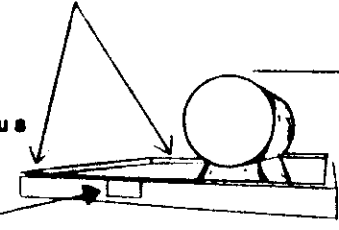
Hazardous Waste Signs at Approaches

Signs of Leaks

Storm Water Accumulation in Diked Area

Gas Line Drip Water Tank
XX Bldg-S

Containment Dike Intact Tank Condition:



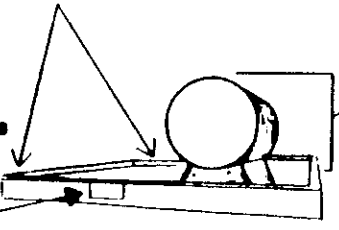
Hazardous Waste Signs at Approaches

Signs of Leaks

Storm Water Accumulation in Diked Area

Gas Line Drip Water Tank
Ingot Strip Area

Containment Dike Intact Tank Condition:



Hazardous Waste Signs at Approaches

Signs of Leaks

Storm Water Accumulation in Diked Area

Gas Line Drip Water Tank
North Quench Tower

Hazardous Waste Inspection

Week Of: - -

Name:

Date:

Dept:

11-9.5d

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt
- 5 Beneficial Use
- 9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

II. GENERATOR'S EPA I.D. NUMBER

☐ For 1983 Only☐ Permanently

F M I D O 8 7 7 3 8 4 3 1 1
1 2 13 14 15

☐ Other _____C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

R O U G E S T E E L C O M P A N Y
30 69

IV. INSTALLATION MAILING ADDRESS

3 3 0 0 1 M I L L E R R D R O O M 2 1 1 0 R O B
15 16 45

Street or P.O. Box

4 D E A R B O R N M I 4 8 1 2 1
15 16 41 42 47 51

City or Town

State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45

Street or Route number

6
15 16 41 42 47 51

City or Town

State Zip Code

VI. INSTALLATION CONTACT

2 D O R O S H E W I T Z G E R A L D
15 16 45

Name (last and first)

3 1 3 - 3 2 3 - 1 2 6 0
46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jerome A. Esper, Plant & Equipment Engineering Manager

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 8 7 7 3 8 4 3 1 1
1 2 13 14 15 T/A C

X. FACILITY'S EPA I.D. NO.

F M I D 0 0 0 7 2 4 8 3 1
16 28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Michigan Disposal, Inc.

XI. FACILITY ADDRESS

49350 N. Service Dr.
Belleville, MI

XII. TRANSPORTATION SERVICES USED

Michigan Disposal, Inc. MID 000724831
Industrial Waste Transportation MIT 270012529
Inland Water Pollution Control MIT 000820365

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Electric Arc Furnace Baghouse Dust	1 5 35	K 0 6 1 38 39 42	9 0 5 3	T
32	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Do not make entries in shaded areas.

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G M I D 0 8 7 7 3 8 4 3 1 1
1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Ford Allen Park Clay Mine

XI. FACILITY ADDRESS

17250 Oakwood
Allen Park, Michigan 48101

X. FACILITY'S EPA I.D. NO.

F M I D 9 8 0 5 6 8 7 1 1
16 28

XII. TRANSPORTATION SERVICES USED

Ford Transportation Services MID 000809756
Doetsch Industrial Services MID 004914032
Power-Vac MID 049267727

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Electric Arc Furnace Baghouse Dust	1 5	K 0 6 1 35 38 39 42	7 7	T
	2	Decanter Tank Tar Sludge From C.O. Oper.	1 5	K 0 8 7	9 0 3	T
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number--see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	8	7	7	3	8	4	3	1	1
1	2											13	14 15

X. FACILITY'S EPA I.D. NO.

F	M	I	D	0	5	7	0	0	2	6	0	2
16												28

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Environmental Waste Control

XI. FACILITY ADDRESS

27140 Princeton Avenue
Inkster, MI 48141

XII. TRANSPORTATION SERVICES USED

Environmental Waste Control

MID 057002602

XIII. WASTE IDENTIFICATION

Sequence #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
1	Coke Oven Gas Line Drip Water	1, 5	D, 0, 0, 3	3, 2, 5, 2, 6, 0	P
2	Light Oil Tank Muck From Coke Oven By-Products	1, 5	D, 0, 0, 1	4, 6, 7, 4, 0, 0	P
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. ☐

Please print/type with elite type (12 characters per inch)

II. FACILITY EPA I.D. NUMBER

This Facility's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently
☐ Other (explain
in comment section)

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF FACILITY

ROUGE STEEL COMPANY

IV. FACILITY MAILING ADDRESS

3 3 0 0 1 M I L L E R R D R O O M 2 1 1 0 R O B 45

Street or P.O. Box

4	D	E	A	R	B	O	R	N	M	I	4	8	1	2	1
15	16	41	42	47	51										
City or Town									State		Zip Code				

V. LOCATION OF FACILITY (if different than section IV above)

15 16 45
Street or Route number

6 15 16 41 42 47 51
 City or Town State Zip Code

VI. FACILITY CONTACT

2 D O R O S H E W I T Z G E R A L D

VII. COST ESTIMATES FOR FACILITIES

3 1 3 — 3 2 3 — 1 2 6 0
46 55
Phone No. (area code & no.)

\$    \$  ,  , 

A. Cost Estimate for Facility Closure

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

VIII. CERTIFICATION

7. CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jerome A. Esper

Manager

Plant & Equipment Engineering

Print/Type Name

Title

Signature of Authorized Representative

Date Signed _____

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Rouge Steel Company

ON-SITE ☒

IX. FACILITY'S EPA I.D. NO.

T/A C

F M I D 0 8 7 7 3 8 4 3 1 1
1 2 13 14 15

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G M I D 0 8 7 7 3 8 4 3 1
16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	Final Coke Oven Gas Cooler Condensate	D 0 0 8 33 34 35 36 37 38 39 40	D 7 9 41 42 43 44 45 46 47 48 49 50 51 52	5 7 8 7 3 2 9 5	P 60 61
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

VII. Costs for closure and post closure are covered by a \$25,000 surety bond required by Michigan Mineral Wells Act of 1969 (PA315).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

cc: Lodino

ROUGE STEEL COMPANY)
3001 MILLER ROAD) Docket No. V-W-86-R-61
DEARBORN, MICHIGAN)
48121-1699)

RESPONDENTS PRE-HEARING EXCHANGE OF INFORMATION

COMES NOW the Respondent in this matter, and through its counsel, makes this pre-hearing exchange of information in accordance with the Court's September 19, 1986, directive.

A. WITNESSES

1. The Respondent in this matter may call the following persons as witnesses in the event that a hearing is held:

(a) Mr. G. Doroshewitz: Manager, Environmental Engineering, Rouge Steel Company. Mr. Doroshewitz will testify as to the inspections conducted at the Rouge Steel Company facility, the alleged violations of the Resource Conservation and Recovery Act ("RCRA") the proposed civil penalty, other aspects of the proposed remedy and other matters.

(b) Mr. Norman Kaufman: Superintendent, Rouge Steel Company. Mr. Kaufman will testify as to various aspects of the method by which hazardous wastes are handled at the Rouge Steel facility.

(c) Expert witness or witnesses: To be identified. This expert, or these experts, will testify as to the operation of the Rouge Steel facility, the generation and the handling of hazardous wastes.

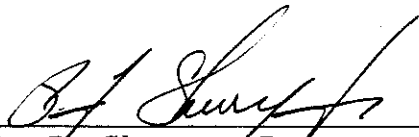
B. DOCUMENTS AND EXHIBITS

All documents and exhibits which the Respondent presently intends to use in a hearing are attached. Respondent reserves the right to petition this Court to add further documents or exhibits to the record of this case, in the event that additional relevant documents or exhibits are developed or discovered between the present and any hearing in this matter.

C. VIEW ON HEARING LOCATION

Respondent suggests that the most convenient location for the hearing is Dearborn, Michigan. The Rouge Steel facility is located in Dearborn, should site inspection be helpful to this Court, and the Respondent's witnesses are located there. An appropriate hearing room and support services can be obtained.

11/26/86
Date



P. J. Sherry, Jr.
Counsel for Respondent
Rouge Steel Company
The American Road
Dearborn, Michigan 48121
(313) 845-5122

2130G

CERTIFICATE OF SERVICE

I certify that the foregoing Respondent's Pre-hearing Exchange of Information dated November 26, 1986 was served on the following parties in the manner described below:

By Certified Mail
Return Receipt Requested

Regional Hearing Clerk
U.S. EPA-Region V
230 South Dearborn Street
Chicago, Illinois 60604

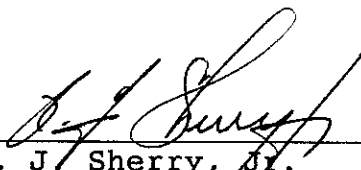
By regular mail:

Roger Grimes
Assistant Regional Counsel
U. S. EPA-Regional V
230 South Dearborn Street
Chicago, Illinois 60604

Marvin E. Jones
Administrative Law Judge
Environmental Protection Agency
Mail Code A-110
401 M. Street, S.W.
Washington, D.C. 20460

Date

11/26/86



P. J. Sherry, Jr.
Counsel for Respondent
Rouge Steel Company
The American Road
Dearborn, Michigan 48121
(313) 845-5122

2130G

RESPONDENT'S EXHIBIT 1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

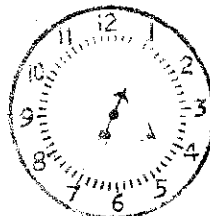
REPLY TO THE ATTENTION OF:

5HE-12

JUL 22 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sidney Kelly
Registered Agent for
Rouge Steel Company
Subsidiary of
Ford Motor Company
The American Road
Dearborn, Michigan 48121



JUL 29 1986

Re: Complaint, Findings
of Violation and Compliance Order
EPA I.D. No: MID 087 738 431

Dear Mr. Kelly:

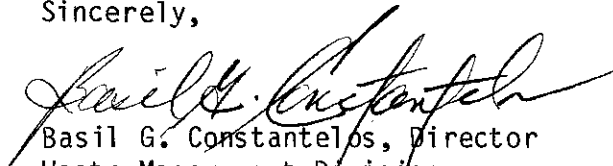
Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Rouge Steel Company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on inspections conducted by the Michigan Department of Natural Resources and other information obtained from our files regarding your facility located at 3001 Miller Road, Dearborn, Michigan. The findings in the Complaint state the reasons for such a determination. In essence, the facility violated regulations applicable to generators and owners and operators of hazardous waste treatment, storage and disposal facilities.

Accompanying the Complaint is a Notice of Opportunity for Hearing and a copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation or Suspension of Permits". Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk (5MF-14) at the United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from receipt of this Complaint. A copy of your request should also be sent to Roger Grimes, Office of Regional Counsel (5C-16) at the same address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions, or desire to request an informal conference for the purpose of settlement, please contact Laura Lodisio, Hazardous Waste Enforcement Branch, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604. Ms. Lodisio may be reached at (312) 886-7090.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosures

cc: Del Rector, Chief
Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Mr. Benedict Okwumabua
MDNR - Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

Mr. P.T. Sullivan
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, Michigan 48121

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF

ROUGE STEEL COMPANY
3001 MILLER ROAD
DEARBORN, MICHIGAN 49504

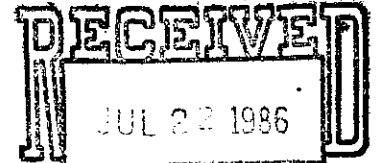
EPA I.D. No: MID 087 738 431

DOCKET NO.

COMPLAINT, FINDINGS
OF VIOLATION AND COMPLIANCE ORDER

V-W- 80 R-61

COMPLAINT



This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA or the Act), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Rouge Steel Company, 3001 Miller Road, Dearborn, Michigan.

This Complaint is based on inspections conducted by the Michigan Department of Natural Resources (MDNR), as an authorized representative of the U.S. EPA, and the other information contained in U.S. EPA files concerning this facility.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information above, it has been determined that Respondent is in violation of 42 U.S.C. Sections 6922, 6924, and 6925, and regulations promulgated thereunder, in that Respondent has failed to comply with certain standards applicable to generators and owners and operators of hazardous waste treatment, storage and disposal

facilities. Specifically, Respondent has been determined to be in violation of regulations 40 CFR 262.34, 262.40, 265 Subparts A, B, C, D, E, F, G, H, K and Q and Part 270.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), and §6928 respectively.

FINDINGS AND DETERMINATIONS

This determination of violation is based on the following:

1. Respondent, Rouge Steel Company, is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15) who owns and operates a facility located at 3001 Miller Road, Dearborn, Michigan 48121 that generates, treats and disposes of hazardous waste. The Respondent is a wholly owned subsidiary of Ford Motor Company, a Michigan Corporation whose registered agent is Mr. Sidney Kelly, The American Road, Dearborn, Michigan.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste or owns or operates a facility for the treatment, storage or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 also provides that no hazardous waste subject to regulation may be transported, treated, stored, or disposed of unless the required notification has been given.
3. U.S. EPA first published regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980.

These regulations are codified at 40 CFR Parts 260 through 265.

Notification to U.S. EPA of hazardous waste handling was required in most instances no later than August 18, 1980.

4. On August 11, 1980, Respondent submitted to U.S. EPA a Notification of Hazardous Waste Activity indicating that the facility generates, treats, stores, or disposes of U.S. EPA hazardous wastes Nos. F001, F016, K080, K061, K062, K087, U002, U226, D001 (Ignitable), D003 (Reactive) and D000 (Toxic). The name of the installation stated on the Notification was Ford Motor Company - Steel Division. On March 24, 1982, Respondent submitted a letter to U.S. EPA stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, a wholly owned subsidiary.
5. Section 3005(a) of RCRA, 42 U.S.C. §6925, requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.
6. Regulation 40 CFR 270.10(e) requires owners and operators of existing hazardous waste management facilities to submit Part A of their RCRA permit application to the Regional Administrator no later than (i) 6 months after the date of the publication of regulations which first require them to comply with the standards set forth in 40 CFR Parts

265 or 266, or (ii) thirty days after the date they first become subject to the standards set forth in 40 CFR Parts 265 or 266, whichever occurs first.

7. Section 3005(e) of RCRA, 42 U.S.C. §6925(e), provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application provided that: (1) the facility was in existence on November 19, 1980, (2) the requirements of Section 3010(a) of RCRA concerning the notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.
8. On November 17, 1980, Respondent submitted to U.S. EPA Part A of their RCRA permit application for disposal of hazardous waste in underground injection wells. The waste type included in the Part A was identified as EPA Hazardous Waste No. D003. On March 26, 1982, Respondent submitted a revised Part A General Information form stating that Ford Motor Company had changed the name of its Steel Division to Rouge Steel Company, and that all other information remained the same.
9. As defined in 40 CFR 260.10 "treatment" means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous,

or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

10. As defined in 40 CFR 260.10 "surface impoundment" or "impoundment" means a facility or part of a facility which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.
11. On March 14, 1986, a RCRA compliance inspection was conducted by the Michigan Department of Natural Resources (MDNR) as an authorized representative of the U.S. EPA. At the time of this inspection it was determined that a hazardous waste management unit at Respondent's facility is a man-made diked excavation which was designed to hold an accumulation of wastes containing free liquids. Specifically, the surface impoundment is used to treat, by solidification, decanter tar sludge from coking operations (U.S. EPA hazardous waste No. K087).
12. At the time of the RCRA compliance inspection on March 14, 1986, it was further determined that Respondent treats by filtration, hazardous waste identified as EPA Hazardous Waste No. D003 prior to disposal in an underground injection well.
13. Based on Findings 9 through 12 above, U.S. EPA has determined that Respondent owns and operates a surface impoundment for the treatment of hazardous wastes and conducts other hazardous waste treatment and is, therefore, subject to all applicable requirements of 40 CFR Part 265,

Subparts A, B, C, D, E, F, G, H, K and Q and the permit requirements of 40 CFR Part 270.

14. Pursuant to requirements of the Hazardous and Solid Waste Amendments of 1984, Section 213, 40 CFR 270.73(c), if granted interim status under Section 3005 of RCRA, a facility must submit a completed Part B permit application and certification of compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, to avoid losing interim status on all surface impoundments. If a Part B permit application and certification of compliance is not received by November 8, 1985, the owner or operator must submit a closure plan, stating his intent to close the facility, to the Regional Administrator no later than 15 days after termination of interim status as required by 40 CFR 265.112(c).
15. On November 4, 1985, U.S. EPA received a letter from Respondent certifying that the No. 2 deep well at the facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements of RCRA.
16. Based on information in the U.S. EPA files, as of November 8, 1985, Respondent failed to submit Part B of the permit application and certify compliance with applicable groundwater monitoring and financial responsibility requirements by November 8, 1985, as required by Section 3005(e) of RCRA for the hazardous waste surface impoundment. RCRA regulated land disposal units that fail to meet the requirements of Section 3005(e) lose interim status and must immediately cease operation and comply with applicable closure requirements.

(includes impoundment?)

17. In a letter dated January 23, 1985, MDNR, as a representative of the U.S. EPA, requested that Respondent submit facility closure and post-closure plans for review. The purpose of this review was to evaluate compliance of the plans with 40 CFR 265 Subpart G. No closure plan was submitted from Respondent in response to this MDNR request.
18. In a letter dated March 29, 1985, U.S. EPA requested that the Respondent provide the agency with a copy of their closure plan because they had failed to submit it to MDNR. In response to this request, Respondent indicated that the facility only disposes of hazardous waste via underground injection and therefore was excluded from the closure requirements of 40 CFR 265 Subpart G.
19. Based on Finding 18 above, U.S. EPA determined that Respondent's facility was subject to the requirements of 40 CFR 265 Subpart R which provides that the owner/operator of a facility which only disposes of hazardous waste by underground injection is not subject to the requirements of 40 CFR Subpart G. This was acknowledged in a letter from U.S. EPA to Respondent dated April 22, 1985.
20. On March 14, 1986, the Michigan Department of Natural Resources conducted a RCRA inspection of Respondent's facility and observed the following additional violations:
 - a) The provisions of 40 CFR 265.13 require that before an owner or operator treats, stores or disposes of any hazardous waste, he must obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis must contain all information which must be known to treat, store,

[Chemicalization] 262.11

or dispose of the waste in accordance with the requirements of 40 CFR Part 265. At the time of the MDNR inspection on March 14, 1986, Respondent could not document that waste analysis had been obtained on all wastes which were generated at the facility. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

- b) The provisions of 40 CFR 262.34(a) and 265.14(c) require that signs with specific labelling or legends must be posted to each entrance to the active portions of a treatment, storage and disposal facility and at other locations, in sufficient numbers to be seen from any approach to the active portion as well as on storage tanks and containers of generated hazardous waste. At the time of the MDNR inspection on March 14, 1986, appropriate "Danger" and "Hazardous Waste" signs were not posted at some of the hazardous waste treatment and storage areas.
- c) The provisions of 40 CFR 265.31 require that facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. At the time of the MDNR inspection on March 14, 1986, hazardous waste (tar decanter sludge; EPA hazardous waste No. K087) was observed to be spilled on the ground without remedial action to correct the violation. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.

- d) The provisions of 40 CFR 265.16(d) require that the owner or operator must maintain personnel training documents and records at the facility. At the time of the MDNR inspection on October 17, 1985, Respondent could not produce adequate records of training. This violation was also cited in an MDNR inspection of October 8 and 10, 1984, and is documented in a letter to Respondent dated October 15, 1984.
21. The violations cited in Finding 20, above were documented in a letter from MDNR to Respondent on April 15, 1986.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

- A. Respondent shall immediately upon this Order becoming final cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the standards for hazardous waste generators and the standards for treatment, storage, and disposal facilities except as provided for in Paragraphs B through E below.
- B. Within 15 days of this Order becoming final, Respondent shall submit a closure plan to the Regional Administrator of the U.S. EPA, stating intent to close the surface impoundment. The closure plan shall meet all the requirements of 40 CFR 265 Subpart G, 40 CFR 265.228, and the permit requirements of 40 CFR 270.1(c). The closure plan must also provide for compliance with the requirements of 40 CFR 265 Subpart F, Groundwater Monitoring.

C. Within 15 days of this Order becoming final, Respondent shall submit to U.S. EPA a revised Part A application for a RCRA permit for treatment and disposal of hazardous waste in accordance with 40 CFR Part 270. Respondent's Part A application, when received, shall be accepted as if timely filed.

D. Within 30 days of this Order becoming final, Respondent shall comply with all applicable requirements of 40 CFR 265 Subparts A, B, C, D, E, G, H and Q regarding the treatment of reactive hazardous waste (U.S. EPA Waste No. D003)X

E. Within 30 days of this Order becoming final Respondent shall provide U.S. EPA with the following:

- 1) Documentation that waste analysis has been obtained ^{See 262.11} on all solid wastes generated at the facility pursuant ²⁶⁴ to the requirements of 40 CFR 265.13.
- 2) Documentation that the appropriate signs have been posted at all hazardous waste treatment and storage areas pursuant to the requirements of 40 CFR 262.34 (a)(3) and 265.14(c).
- 3) Documentation that the facility is maintained and operated to minimize the possibility of a fire, explosion or any sudden or non-sudden release of hazardous waste or waste constituents to air, soil or surface water which could threaten human health and environment and that remedial action has been taken to clean up all spills of hazardous waste pursuant to 40 CFR 265.31.
- 4) Copies of personnel training records which document compliance to the requirements of 40 CFR 265.16(d).

F. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Laura Lodisio, RCRA Enforcement Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to:

Mr. Benedict Okwumabua
Michigan Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of THIRTY-SIX THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS (\$36,750) against the Respondent, Rouge Steel Company, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the

payment shall be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator you must file a written Answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your Answer and any subsequent documents filed in this action should be sent to Roger Grimes, Assistant Regional Counsel, at the same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your Answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said Answer should contain: (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

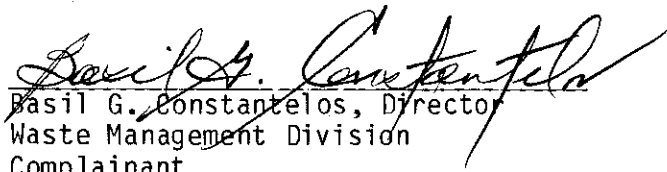
The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Ms. Laura Lodisio, RCRA Enforcement Section (5HE-12), at the address cited above, or by calling her at (312) 886-7090.

Dated this 21st day of July, 1986.


Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Mr. Sidney Kelly
Registered Agent for
Rouge Steel Company
Subsidiary of
Ford Motor Company
The American Road
Dearborn, MI 48121

and

P.T. Sullivan, President
Rouge Steel Company
3001 Miller Road
P.O. Box 1699
Dearborn, MI 48121

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, at 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this 22 day of July, 1986.

Jean Sharp, for
Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

RESPONDENT'S EXHIBIT 2

In the Matter of:

MID 087 738 431

2. Paragraph 2 recites provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon the material facts.

3. Paragraph 3 recites the existence of regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon the material facts.

4. Respondent admits the allegations of Paragraph 4 and asserts that it currently generates only the following hazardous wastes: F001; K061; K062; D001 and D003 and disposes of D003 by means of an underground injection well.

5. Paragraph 5 recites statutory and regulatory provisions which do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based on material facts.

6. Paragraph 6 recites regulatory provisions which do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based on material facts.

7. Paragraph 7 recites statutory and regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon material facts.

8. Respondent admits the allegations of Paragraph 8.

9. Paragraph 9 recites regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined based upon material facts.

10. Paragraph 10 recites regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be determined and based upon material facts.

11. Respondent admits that on March 14, 1986, a RCRA compliance inspection was conducted. Respondent denies the allegation of Paragraph 11 that Respondent was, or is, treating decanter tank tar sludge from coking operations. Respondent denies the allegation of Paragraph 11 that it maintained a "surface impoundment" or "impoundment" as defined in 40 CFR § 260.10.

12. Respondent denies the allegation contained in Paragraph 12. Respondent asserts that the filtration of EPA Hazardous Waste No. D003 is within a "totally enclosed facility" exempt from being considered a treatment facility pursuant to 40 CFR §270.1(c)(2)(iv) and §265.1(c)(9).

13. Respondent denies the allegation of Paragraph 13 that it owns and operates a surface impoundment for the treatment of hazardous wastes and denies, therefore, that it is subject to all applicable requirements of 40 CFR Part 265 Subparts A, B, C, D, E, F, G, H, K, and Q and the permit requirements of 40 CFR Part 270.

14. Paragraph 14 recites statutory and regulatory provisions that do not require an admission or denial by Respondent, the relevancy of such provisions to be based on material facts.

15. Respondent admits the allegation of Paragraph 15.

16. Respondent denies the allegations contained in Paragraph 16. Respondent asserts that it has not maintained, and does not maintain a "surface impoundment" and, therefore, was not required to file a Part B.

17. Respondent admits the allegations contained in Paragraph 17. In addition, however, Respondent asserts that the MDNR letter of January 23, 1985, pertained only to the No. 2 deep well. Respondent further asserts that it was told orally by EPA to ignore the request, as the well was covered by 40 CFR 265 Subpart R.

18. Respondent admits the allegations contained in Paragraph 18.

19. Respondent admits the allegations contained in Paragraph 19, and asserts that based on the finding of Paragraph 19, Paragraphs 17, 18, and 19 should be withdrawn from the Complaint.

20. (a) Respondent denies the allegations contained in Paragraph 20(a), and asserts that 40 CFR §265.13 is not relevant to any hazardous wastes other than EPA Hazardous Waste No. D003.

(b) Respondent denies, in part, the allegation of Paragraph 20(b). Respondent asserts that it had not failed to post "Danger" signs at disposal areas. Respondent asserts that any failure to post "Hazardous Waste" signs has since been remedied.

(c) Respondent denies the allegations contained in Paragraph 20(c). Respondent asserts that any spill of a hazardous waste was de minimis and that remedial action to prevent recurrence has been taken.

(d) Respondent denies the allegations contained in Paragraph 20(d).

21. Respondent admits the receipt of the letter from MDNR.

COMPLIANCE ORDER

A. Respondent asserts that it does not treat, store or dispose of hazardous waste except as is in compliance with applicable standards.

B. Respondent asserts that it does not operate a surface impoundment and, therefore, is not required by law to submit a closure plan.

C. Respondent asserts that it is not required by law to submit a Part A application for a RCRA permit, as it does not operate a surface impoundment nor does Respondent treat hazardous waste.

D. Respondent asserts that it does not treat EPA Waste No. D003 and, therefore, is not required to comply with the requirements of 40 CFR 265 Subparts A, B, C, D, E, G, H and Q regarding the treatment of reactive hazardous waste.

E. Respondent asserts that by a letter dated May 15, 1986 to the MDNR, Respondent has already demonstrated compliance with the requirements of Paragraphs E(1), (2), (3) and (4), to the extent required by law.

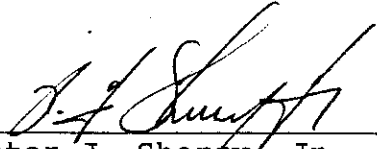
PROPOSED CIVIL PENALTY

Respondent asserts that the proposed penalty assessment of Thirty-Six Thousand Seven Hundred and Fifty Dollars (\$36,750) is excessive in light of Respondent's assertions above.

REQUEST FOR HEARING

Respondent requests a hearing on the material facts contained in the Complaint and on the amount of the proposed penalty assessment.

Respectfully submitted,

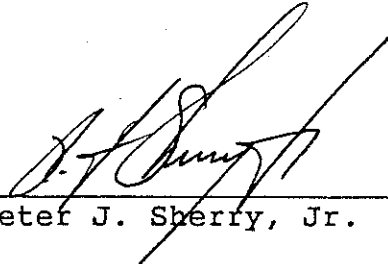


Peter J. Sherry, Jr.
Attorney for Respondent
Rouge Steel Company
The American Road
Dearborn, Michigan 48121-1899
(313) 845-5122

1258Q

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August, 1986, the foregoing Answer and Request for Hearing (a) was filed by placing the original in the United States mails, postage pre-paid, and addressed to Ms. Beverly Shorty, Regional Hearing Clerk, (5MF-14), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, and (b) has been served by placing a copy thereof in the United States mails, postage pre-paid, and addressed to Roger Grimes, Office of the Regional Counsel, (5C-16), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.



Peter J. Sherry, Jr.

1281Q

RESPONDENT'S EXHIBIT 3

AUG 15 '86 AM

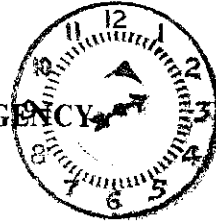


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604



M. E. DAVENPORT
Assistant Regional Administrator

5HE-12

AUG 13 1986

George Kircos, Senior Attorney
Ford Motor Company
The American Road
Room 554-WHQ
Dearborn, Michigan 48121-1899

Re: Rouge Steel Company
U.S. EPA I.D. No. MID 087 738 431

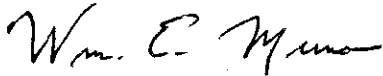
Dear Mr. Kircos:

As you discussed with Laura Lodisio of my staff by telephone on August 7, 1986, and in response to your request, I am forwarding a list of the specific violations for which penalties were assessed in the Administrative Complaint issued to Rouge Steel Company by the United States Environmental Protection Agency on July 22, 1986. They are as follows:

<u>Violation</u>	<u>Regulation</u>	<u>Penalty</u>
1) Treatment in a surface impoundment without a permit or interim status	40 CFR 270	9500.00
2) Treatment of reactive hazardous waste without a permit or interim status	40 CFR 270	2250.00
3) Failure to comply with TSD standards for treatment in a surface impoundment and by filtering	40 CFR 265 - Subparts A, B, C, D, E, F, G, H & Q	9500.00
4) Failure to post required signs	40 CFR 262.34(a)(3) 40 CFR 265.14(c)	4000.00
5) Failure to conduct/document waste analysis to characterize solid waste	40 CFR 265.13	4000.00
6) Lack of adequate personnel training records	40 CFR 265.16(d)	1000.00
7) Failure to prevent release of hazardous waste to environment (i.e. spills)	40 CFR 265.31	6500.00

If you have questions regarding this matter please contact Roger Grimes, Assistant Regional Counsel at (312) 886-6595 or Laura Lodisio at (312) 886-7090. Staff will be prepared to discuss the above in more detail at the time of the settlement conference scheduled for August 20, 1986.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Section

cc: Ben Okwumabua, MDNR

RESPONDENT'S EXHIBIT 4

RESPONDENT'S EXHIBIT 5

ROUGE STEEL COMPANY
Coke Oven Operation
Filtration Before Deep Well Injection
Technical Summary

Background

Rouge Steel Company produces coke from coal for use in its iron-making operations. By-products of coke production are recovered and utilized as various products. One by-product of coking which is not utilized is water. Excess water is blown down from the Naphthalene recovery system and disposed of by injection in an on-site deep well. To make this excess water amenable for deep well disposal, the water must be filtered. Filtration removes small particles of Naphthalene that could plug the deep well receiving geologic formation. Filtration takes place in a series of closed steel containers integrally connected by solid steel piping and integrally connected to an industrial production process. Filtered water is injected in the deep well. Removed material - Naphthalene - and the filter media are returned to the coking process.

Coke Process

Conversion of coal into coke is a distillation process. Coal is heated in the absence of oxygen to form coke (carbon) and a variety of products. By-products are removed from the coke ovens by gas mains as a hot gas. The gas is cooled in the mains by ammonia liquor. This liquor picks up tar, light oils, and ammonia. Partially cooled gas passes through water sprays in the final gas coolers. At this point Naphthalene and moisture from the coal condense out. Naphthalene is distilled from the cooler water/naphthalene/moisture mixture. Condensed moisture must be removed from the final cooler water system to prevent the system from overflowing. Final cooler water blow down is a non-ignitable, non-corrosive, non-volatile waste containing cyanide and sulfide (see Attachment 1).

Water Disposal

The final cooler water level is monitored in the final cooler Sump. When the water rises to a pre-determined level, a sensor transmits a signal to a Bristol controller to open the Bristol Diaphragm Valve (see Attachment 2). The valve remains open until the water level drops to the desired operating level. Final cooler water system blow down is disposed of by deep well injection. If this water is injected as blown down, small Naphthalene particles in the water will blind the receiving formation and fill the well casing.

To make this blow down more amenable for disposal, a set of filters is installed in the pipe between the Bristol Diaphragm Valve and the Surge Tank. These filters are of successively smaller equivalent mesh size; beginning at 100 microns and finishing at 1 micron. Two different types of filters are used. The first set, called Sparkler filters, use diatomaceous

Water Disposal (continued)

earth as the filter media. The two Sparkler model SCJ-24-17 filters are cylindrical, horizontally mounted, closed steel containers housing filter discs. These discs are coated with a diatomaceous earth slurry. Water entering the filter container must pass through the filter discs to exit the container. These filters remove particles down to 100 microns diameter. There are no vents or relief valves on the Sparkler filters.

Discharge from the Sparkler filters continues on to a set of 3 GAF cartridge-type filters. These filters are enclosed in cylindrical, vertically mounted, closed steel containers. These filters have successively smaller mesh sizes; a 4 pac unit at 50 microns, a 2 pac unit at 5 microns, and a 1 pac unit at 1 micron. There are no vents or relief valves on the GAF filters.

Discharge from the cartridge filters flows to the Surge Tank. This tank is used to assure an adequate supply of water for the injection pump. The Surge Tank is vented inside the building. The purpose of the vent is to equalize tank pressure as the water level rises and falls.

Should an overflow occur, water would flow through the overflow pipe to the WW Building trench (see Leakage, below).

All the elements of this disposal system from the final cooler water main to the injection pump are connected by schedule 40 steel piping. The filter units are closed steel containers. Schedule 80 steel pipe is used between the injection pump and the well head.

Filter Media

The filter media in both Sparkler and GAF filters must be regularly changed. The filters become blinded with Naphthalene particles. Because Naphthalene is a carbon compound, it is returned to the coking process; the original process from which it is generated.

Leakage

The entire filter process is contained within the walls of the WW Building. Should leaks occur they would flow into a concrete-lined trench connecting the WW Building with the pitch pit at the flush liquor decanters. All leaked or vented material is returned to the coking process at the flush liquor system.

September 24, 1986



CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

Attachment 1

page 1 of 2

Number 601850

April 25, 1986

To: T. Weber

Subject: Wastewater
Specification: Not Provided
Supplier: Rouge Environmental Services (RES)

Object: Analyze the submitted water sample for the tests listed in the test data for information.

SAMPLES/DATA RECEIVED: The Sample was collected from "Deep Well" by C. Ozar (RES) on April 22, 1986 for permit requirement.

Test Data:

<u>Tests</u>	<u>Results</u>	<u>Date Analyzed</u>	<u>Analyst</u>
pH (EPA-600/4-79-020, M 150.1)	7.3	4/22/86	C. Ozar (RES)
Specific Gravity (Paar densitymeter)	1.000	4/22/86	D. Lopes
Benzene, mg/L	28	4 22/86	D. Lopes
Naphthalene, mg/L (Extraction with methylene chloride as B/N, then Gas Chromatograph/Mass Spectrometer)	20	4/22/86	D. Lopes
Phenols ^a , mg/L (EPA-600/4-79-020, M 420.1)	928	2/23/86	D. Lopes
Cyanide ^a , mg/L (EPA-600/4-79-020, M 335.1&2)	277	4/23/86	Barry Schigelone
Total Suspended Solids, mg/L (EPA-600/4-79-020, M 160.2)	7	4/23/86	Barry Schigelone
Residual Chlorine, ppm (Hach portable chlorine tester)	none detected	4/22/86	D. Lopes
Sulfur (Total), mg/L (Inductively Coupled Plasma Emission Spectroscopy)	187	4/24/86	R. O'Donnell



CENTRAL LABORATORY

LABORATORY INVESTIGATION REPORT

TEST DATA: (continued)

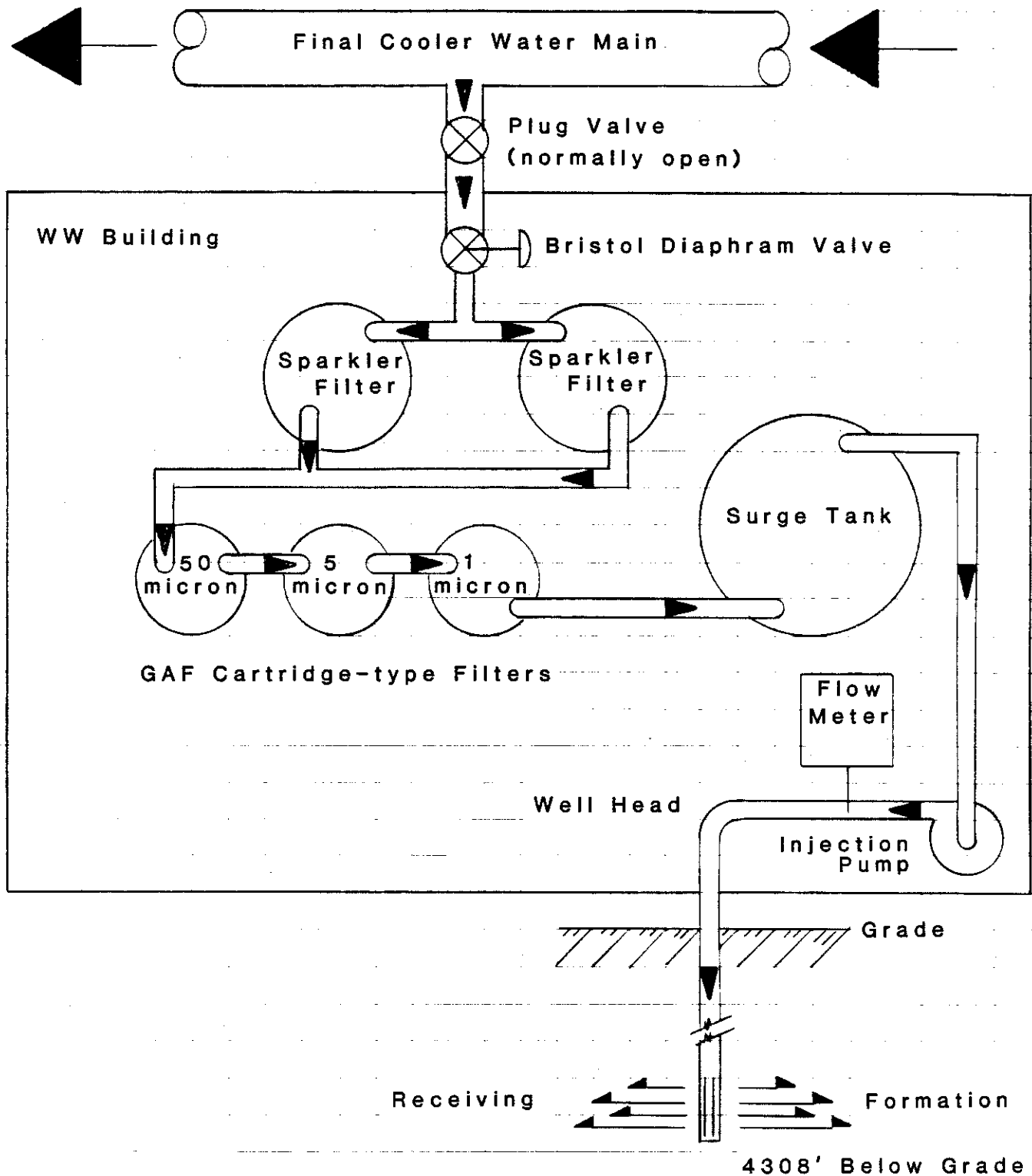
<u>Tests</u>	<u>Results</u>	<u>Date Analyzed</u>	<u>Analyst</u>
Sulfide, mg/L (EPA-600/4-79-020, M 376.2; 0.02N Sodium thiosulfate)	42	4/23/86	D. Lopes
Chloride, mg/L (Ion Chromatograph)	2.7	4/25/86	Monica Drouillard

"a" The sample was preserved by adding sodium hydroxide (pH > 12) and sulfuric acid (pH < 4) for cyanide and phenols measurements respectively.

By: Diago P. Lopes
Diago P. Lopes
Laboratory Specialist
Environmental Section
Chemistry Department

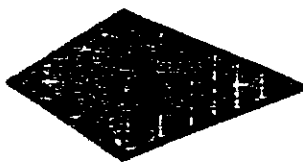
dpl/DPL

Deep Well Injection Facility Schematic



RESPONDENT'S EXHIBIT 6

RESPONDENT'S EXHIBIT 7



ENVIRONMENTAL
CONTROL
TECHNOLOGY
CORPORATION

3985 RESEARCH PARK DRIVE
ANN ARBOR, MICHIGAN 48104
313/761-1389

September 5, 1985

Mr. John A. Scott
ROUGE STEEL COMPANY
3001 Miller Road
P.O. Box 1697
Dearborn, MI 48121-1699

Dear Mr. Scott:

Enclosed is the data generated on the samples obtained by us in compliance with your hazardous waste control program. The data on the four light oil muck samples indicated that this material is not hazardous under the RCRA guidelines. The remaining materials do indicate at least one hazardous characteristic, except for the electric arc furnace dust. I have been informed that the characteristics of this dust can change significantly depending upon the character of the feed materials used in the furnace. Consequently, I am not sure what the potential would be for delisting this material without further testing.

Very truly yours,

ENVIRONMENTAL CONTROL TECHNOLOGY CORPORATION

John E. Schenk
Executive Vice President

JES/crn

Enclosure

32074 !

RCRA ANALYSIS

MATERIAL

Coke Oven Tar Sludge

PHYSICAL STATE

Black, "Sticky", Amorphous Solid - Phenolic & Naphthalene Odor

RCRA CHARACTERISTICS

IGNITABILITY

FLASHPOINT 61°C

CORROSIVITY

PH N.A.

REACTIVITY (mg/l)

CYANIDE

SULFIDE

TOXICITY-EXTRACTION PROCEDURE (mg/l)

ARSENIC 0.004

BARIUM 0.08

CADMIUM < 0.02

COPPER < 0.02

CHROMIUM 0.05

LEAD < 0.02

MERCURY < 0.0002

SELENIUM < 0.002

SILVER < 0.01

ZINC 0.06

RESPONDENT'S EXHIBIT 8

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

January 23, 1985

Rouge Steel Co.
3001 Milten Road
Dearborn, Michigan

RE: MID 087738431

Gentlemen:

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment, storage, and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
Northville, MI 48167

If you have questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, reading "Benedict N. Okwumabua".

Benedict N. Okwumabua, PhD.
District Supervisor
Hazardous Waste Division

cc: U.S. EPA
J. Bohunsky
A. Howard

RESPONDENT'S EXHIBIT 9

MAR 29 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rouge Steel Company
3001 Milten Road
Dearborn, Michigan 48121

Re: Letter of Warning
Rouge Steel Company
MID 087 73E 431

Gentlemen:

On January 23, 1985, the Michigan Department of Natural Resources (MDNR) requested the Rouge Steel Company to submit a copy of their closure plan. To date, MDNR has not received the company's closure plan.

The MDNR is obligated to review the adequacy of closure plans under 40 CFR 265 Subpart G through the FY 85 Hazardous Waste Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA).

Because the Rouge Steel Company failed to submit a copy of their closure plan to MDNR, the U.S. EPA is requesting that Rouge Steel Company provide our Agency with a copy of the closure plan. Failure to provide this plan within 30 days of receipt of this notice will subject the facility to further enforcement action. Please forward a copy of an up-to-date closure plan to:

U.S. Environmental Protection Agency
Hazardous Waste Enforcement Branch
RCRA Enforcement Section - 5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

Two additional copies of the closure plan should also be sent to:

Michigan Department of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, Michigan 48167

If you have any questions, please contact Ms. Sharon R. Johnson of my staff at (312) 886-4592.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

cc: J. Bohunsky, MDNR
B. Okwumbua, MDNR
S.E. District Office

R 557 059-430

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Rouge Steel Co		PS Form 3800, Feb. 1982	
Street and No. 3001 W. 14th Rd		PS Form 3811, July 1983	
P.O., State and ZIP Code Dearborn, MI 48121		U.S.G.P.O. 1983-403-517	
Postage \$2.25	Certified Fee \$1.75	Return Receipt showing Date, and Address of Recipient	
Special Delivery Fee	Restricted Delivery Fee	Return Receipt showing Date, and Address of Recipient	
TOTAL Postage and Fees		Postmark or Date	

PS Form 3811, July 1983

INITIALS
DATE

TYPIST
3-28

AUTHOR
3-28-85

STU #1
CHIEF
3-28-85

STU #2
CHIEF

STU #3
CHIEF

TFS
CHIEF
WEA
3-28-85

WMB
CHIEF

WMD
DIRECTOR

RESPONDENT'S EXHIBIT 10



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

(9)

REPLY TO ATTENTION OF:
5HE-12

APR 22 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas G. Weber
Rouge Steel Company
3001 Millen Road
P.O. Box 1631 Rm. 2110
Dearborn, Michigan 48121-1631

Re: Letter of Warning
Rouge Steel Company
EPA I.D. No.: MID 087 738 431

Dear Mr. Weber:

On March 29, 1985, the United States Environmental Protection Agency (U.S. EPA) issued Rouge Steel Company a Letter of Warning for failure to submit its closure plan. 40 CFR 265, Subpart R provides that the owner/operator of a facility which disposes of hazardous waste by underground injection is excluded from the closure requirements identified in 40 CFR 265, Subpart G.

Based on your conversations with Pat Vogtman of my staff, and a review of your Part A application, it appears that Rouge Steel Company only disposes of hazardous waste via underground injection. Therefore, U.S. EPA has determined that Rouge Steel Company is not subject to 40 CFR 265, Subpart G, and, therefore, is not required to send U.S. EPA a closure plan.

If you have any questions, please call Pat Vogtman of my staff at (312) 886-4591.

Sincerely yours,

Richard C. Karl

Richard C. Karl, Chief
MI/WI Unit
RCRA Enforcement Section

cc: Ben Okwumabua, MDNR

RESPONDENT'S EXHIBIT 11



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
FRANCESCO CAROLLO
JOHN A. HOEFER
STEPHEN F. MONSMA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

July 2, 1985

Rouge Steel Co.
3001 Miller Road
P.O. Box 1631 Rm. 2110
Dearborn, MI 48121-1631
Attn: Thomas Weber

RE: MID 087738431

Dear Mr. Weber:

This letter is in regard to our January 23, 1985, request for a closure plan, U.S. EPA's letter of warning of March 22, 1985, and U.S. EPA's letter of April 22, 1985.

We are withdrawing our request for a closure plan based on information that Rouge Steel Co. is disposing of hazardous waste by underground injection and a closure plan is therefore not required.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua

RESPONDENT'S EXHIBIT 12

EXHIBIT 12 DELETED

RESPONDENT'S EXHIBIT 13

ROUGE STEEL COMPANY
HAZARDOUS WASTE CONTINGENCY PLAN

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I - Iron Making, M - Melting, F - Finishing, P/S - Power and Utility/Shops

PLANT OPERATIONS

The Rouge Steel Company is involved in the production and processing of steel and resulting by-products. As a result of these activities and the waste products produced, the facility is classified as a Generator of Hazardous Wastes and is subject to the regulations of 40 CFR 262, 40 CFR 264, and 265.

Treatment Storage and Disposal

Hazardous wastes generated at this facility and their corresponding waste code numbers are as follows:

- Coke oven drip water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the presence of cyanide and sulfide.
- Final cooler water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the concentration of cyanide and sulfide.
- Coke oven tar sludge (K087) - regulated under 40 CFR 261.23 (a) (5)
- Light oil Muck (D003) - regulated under 40 CFR 261.23 (a) (5) due to cyanide.
- Waste halogenated solvents (F001) - listed as hazardous in 40 CFR 261.31; 1, 1, 1-trichloroethane from vapor degreasing and methylene chloride from dip degreasing.
- Electric arc furnace dust (K061) - listed under 40 CFR 261.32 because of the potential presence of chromium, lead, and cadmium.
- Waste pickle liquor (K062) - listed under 40 CFR 261.32 because of the possible presence of chromium and lead.
- Waste mineral spirits (D001) - combustible material from parts washers; serviced by Safety Kleen. Mineral spirits are reprocessed by Safety Kleen per 40 CFR 265.

On-site disposal of final cooler water occurs through deep-well injection. This portion of the facility is regulated under 40 CFR 265.430. All of the other wastes are transported off-site for disposal.

EMERGENCY NOTIFICATION PROTOCOL

Personnel are instructed to immediately contact Rouge Plant Security in the event of a spill of hazardous materials. The Plant security Office is staffed 24 hours per day, 365 days per year, and maintains an up-to-date emergency call list.

Rouge Plant Security
3001 Miller Road
Dearborn, MI 48121

(313) 322-3211
(313) 322-7690

An Environmental representative has been assigned responsibility for coordinating responses to environmental incidents such as hazardous waste spills. Plant Security has been instructed to immediately contact this individual in the event of a serious spill which cannot be contained by on-scene personnel or which poses a threat to public health or the environment.

On weekends and off-shifts, Security will contact the assigned "on call" Environmental Engineer. The "on call" list is published the last week of each month for the succeeding month.

The "on call" list distribution is:

W. Dotterer	(Environmental Services)
Gas Dispatcher	(Primary Operations)
J. Stewart	(Marine Operations)
R. Klaes	(Melting Operations)
D. McDermid	(Hot Mills Operations)
N. Pahl	(Cold Mills Operations)
S. Polonczyk	(Security)
S. Rosa	(Power Operations)
R. Sayre	(Safety)
G. T. Simmons	(Rouge Fire Department)

PRIMARY EMERGENCY COORDINATOR

Gerald Doroshewitz
13745 Strathecona #227
Southgate, MI 48195
284-7648

If the Primary Emergency Coordinator cannot be reached, Plant Security has been instructed to contact an Alternate Emergency Coordinator.

John Forrester
4249 Climbing Way
Ann Arbor, Michigan 48103
1-426-3631

William Gaines G. E. Waggoner, Jr.
45021 Foxton 6775 Plainfield
Novi, Michigan 48050 Dearborn Heights, MI 48127
1-348-3414 274-4925

Rudolph Dawson
2164 Margery Street
Ypsilanti, Michigan 48198
1-485-4270

Stephen Landes
1260 Barrister
Ann Arbor, Michigan 48105
1-769-7570

David O'Connor
18680 Bungalow Drive
Lathrup Village, Michigan 48076
569-7742

Robert Toth
22355 Kingston Court
Woodhaven, Michigan 48183
676-1450

Outside Agencies

In the event of an incident which presents a serious hazard to property or public health and safety, the Rouge Fire Department will notify the following municipal agencies:

Dearborn Fire Department
Telephone: 943-2100

Dearborn Police Department
Telephone: 943-2200

Medical emergencies would be handled by the on-site facility:

Rouge Medical Facility
Telephone: 323-0045
Ambulance: 322-1133
Emergencies: 322-3313

Outside Agencies (continued)

In the event of a significant incident involving personal injury, the emergency facilities of Oakwood Hospital would be used.

Oakwood Hospital
18101 Oakwood, near Southfield
Dearborn, MI 48124
Emergency Department: 593-7440

Other than the above mentioned emergency responses to the local public safety agencies, it is the responsibility of the Environmental Representative to notify the appropriate governmental agencies in the event of an environmental incident. The various agencies which would be notified, as appropriate, include the following:

Primary Contacts

1. U.S. Coast Guard - EPA
National Response Center
Washington, DC
(800) 424-8802
2. State of Michigan
Department of Natural Resources
Pollution Emergency Alert System (PEAS)
(800) 292-4706

Alternate Contacts

1. U.S. Coast Guard
Captain of the Port - Detroit
Marine Safety Office
McNamara Office Building
(313) 226-7777
2. U.S. Environmental Protection Agency, Region V
Michigan-Ohio District Office
9311 Groh Road
Grosse Ile, MI 48138
(313) 675-6500
3. Michigan Department of Natural Resources
Detroit Area District
15500 Sheldon Road
Northville, MI 48167
(313) 459-9180

In the event that hazardous materials have been or are likely to be discharged to the sewer system, the following agencies are also to be notified:

Detroit Water and Sewage Department
933-4145
or 833-4077

Dearborn Water Department
943-2307

HAZARDOUS WASTE CONTINGENCY PLAN

The following General Contingency Plan will be initiated upon any release of hazardous materials which cannot be maintained by on-scene personnel and that could threaten human health or the environment. It will also be instituted upon recognition of any condition which could result in such a release if not corrected or controlled. Detailed specific plans apply to each of the individual hazardous materials present on-site.

A. Responsibilities of On-Scene Personnel

1. Initiate notification procedure according to emergency call list, providing the following information:
 - a. Location of incident.
 - b. Extent of emergency response required (e.g. fire apparatus, ambulance).
 - c. Any circumstances known which may affect emergency response.
 - d. Name of person making report.
2. Initiate spill response and control measures, such as:
 - a. Close valves to isolate system where possible.
 - b. Isolate spill to greatest extent possible by use of earthen dams or absorbent materials. Do not use absorbents to soak up spilled material unless necessary to prevent material from moving into sewers, confined spaces or the river.
 - c. Provide barriers to prevent unauthorized access to spill site.
3. Remain on-site until arrival of emergency response personnel.

B. Responsibility of Emergency Coordinator

1. Evaluate situation based on initial information and give instructions as required.
2. Proceed immediately to location of incident to direct emergency efforts.
3. If a release of hazardous waste has occurred which could threaten human health or the environment, immediate notification must be given to the National Response Center (800) 424-8802, including:
 - a. Reporting individual's name and telephone number.
 - b. Rouge Steel Company and location of spill (e.g. coke ovens).
 - c. Time and type of incident.
 - d. Amount and name of materials involved.
 - e. Any injuries.
 - f. Hazards to public health and environment.
4. Immediately make a complete record of the incident.
5. Submit a written report to the EPA Regional Administrator and the Michigan Department of Natural Resources within 15 days of the incident (264.56j).

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

EXPLANATIONS OF WORDS AND TERMS

Full Protective Clothing

This means protection to prevent inhalation of, ingestion of, or skin contact with hazardous vapors, liquids and solids. It includes a helmet, self-contained breathing apparatus, coat, pants, rubber boots and gloves customarily worn by fire fighters. This **turnout clothing may not** provide protection from vapors, liquids or solids encountered during hazardous materials incidents. Full protective clothing should meet the OSHA Fire Brigades Standard (29 Code of Federal Regulations 1910.156). Chemical-cartridge respirators or gas masks are **not** acceptable substitutes for self-contained breathing apparatus. The demand-type self-contained breathing apparatus is being phased out of service since it does not meet the OSHA Fire Brigades Standard cited above.

Special Protective Clothing and Equipment

This category of clothing and equipment will protect the wearer against the specific hazard for which it was designed. The special clothing may afford protection only for certain chemicals and may be readily penetrated by chemicals for which it was not designed. Do not assume any protective clothing is fire resistant unless that is specifically stated by the manufacturer.

Isolate Hazard Area and Deny Entry

Keep everybody away from the hazard area if not directly involved with the emergency response or rescue operation. Do not let unprotected people into the area. Conduct any rescue operation as quickly as possible entering the scene from the upwind approach. This "isolate" step is the first to be taken even if "evacuation" is to follow.

Evacuate

Remove all people from area and buildings as far as recommended in the evacuation distance table presented in the back of this guidebook. Good judgment must be used in evacuation procedures to avoid placing people in greater danger. Topographic maps may assist you in the planning and execution of evacuations. You may obtain indexes of the topographic maps published for each state free of charge on request from the nearest office of The U.S. Geological Survey. Buy the maps you need to cover your area of responsibility. Preplanning and response team training is recommended.

Decontamination of Personnel and Equipment

Emergency services personnel should be decontaminated as soon as possible after contact occurs. Since the methods to be used differ from one chemical to another it is important to contact the shipper and medical authorities quickly to determine the most appropriate decontamination procedures. Contaminated protective clothing and equipment should be isolated to prevent further human contact, and should be stored in a restricted area (hot zone) at the incident site until appropriate decontamination procedures can be determined. In some cases, protective clothing and equipment cannot be decontaminated and will have to be disposed of according to appropriate state and federal guidelines.

Positive Pressure Breathing Apparatus

Positive pressure breathing apparatus is the best choice for complete protection during operations involving hazardous materials. Use apparatus certified by NIOSH and the Mine Safety and Health Administration in accordance with 30 Code of Federal Regulations Part II (30 CFR Part II) and used in accordance with the Respiratory Protection Standard (29 CFR 1910.134) and the OSHA Fire Brigades Standard (29 CFR 1910.156).

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

Emergency Equipment Plot Plan

Legend

MAP SYMBOLS



AUTOMATIC
SPRINKLERS



SPRINKLER RISER



TRIPLE HYDRANT



AIR PACK



FIRE BLANKET



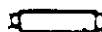
ANSUL DRY
CHEMICAL



CARBON DIOXIDE



WATER



STRETCHER



BOX



FIRE HOSE

P.I.V. POST. IND. VAL.



FOAM HOSE



PULL STATION

HAZARDOUS MATERIALS INVENTORY

Material: Coke Oven Drip Water

Type of Storage: 5 - 10,000 gallon tanks*
1 - 5,000 gallon tank*
2 - 2,000 gallon tanks**
2 - 1,500 gallon tanks**
1 - 1,000 gallon tank**
1 - 12,000 gallon tank*

Location: Various locations in coke oven area

Method of Disposal: Removed by licensed waste hauler

*Above ground tank locations:

1. XX Bldg. - North
2. XX Bldg. - South
3. North Quench Tower
4. Coal and Coke Lab
5. West Head House
6. EE Bldg. - N. E. Corner
7. Gas Holder

**Underground tank locations:

1. JJ Building
2. Old Booster Station
3. Continuous Caster (Specialty Fdry)
4. Frame Plant East
5. Frame Plant West

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Oven - Drip Water

Description

Moisture in Coke oven gas condenses and collects in gas piping. This material is captured at drip legs and is accumulated in tanks. It is normally used as coke quench make up.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable (Flash)	90°C	-	No
. Corrosive (ph)	7.8	6.1	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	-	No
Caustic	-	-	No
Cyanide (mg/l)	720	690	Yes
Sulfide (mg/l)	120	302	Yes
Explosive	-	-	No
. Toxic (in mg/l)			
Arsenic	0.003	0.2	No
Barium	0.10	0.2	No
Cadmium	0.02	0.1	No
Chromium	0.03	0.1	No
Lead	0.18	0.1	No
Mercury	0.116	0.1	No
Selenium	0.004	0.1	No
Silver	0.01	0.1	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, Liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003 (Reactive: Cyanide and Sulfide)
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 55

HEALTH HAZARDS

Poisonous; may be fatal if inhaled, swallowed or absorbed through skin.
Contact may cause burns to skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control water may give off poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Cylinder may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Ventilate closed spaces before entering them.
Wear **positive pressure** breathing apparatus and special protective clothing.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Fight fire from maximum distance.
Dike fire control water for later disposal; do not scatter the material.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material
and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container
and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin or eyes with running
water for at least 15 minutes.
Speed in removing material from skin is of extreme importance.
Remove and isolate contaminated clothing and shoes at the site.
Keep victim quiet and maintain normal body temperature.
Effects may be delayed; keep victim under observation.

*NOTE: This information is taken from the "1984 Emergency Response
Guidebook;" Dept. of Transportation Publication DOT P 5800.3

CONTINGENCY PLAN
Coke Oven Drip Water

Coke oven gas line drips are collected in seven above ground (5,000 and 12,000 gallon) and five below ground tanks. Control of this waste thus relies on the integrity of the individual tanks and the piping system which carries the coke oven gas and which directs the resulting drip water to the collection tanks. This material is a clear, lightly colored liquid which is non-corrosive, non-flammable, and relatively non-toxic. The hazardous designation derives from the potential for release of toxic gases if mixed with highly acidic solutions.

The piping system is monitored visibly by furnace patrol personnel a minimum of once per shift. These personnel are routinely equipped with the standard safety equipment of gloves, coveralls, hard hat, safety shoes, and safety glasses. In the event of a leak being observed, the patrol person will isolate the problem portion of the system by closing the appropriate valves. The volume of gas line drips in the piping system at any one time is very small. Leaks would be contained in a small volume of soil at the point of the leak. There is no source of acid within the gas line system, and consequently, there is no way for the hazardous characteristic of this material to be manifest.

The greater opportunity for uncontrolled release of this material is from the storage tanks because of the larger volume involved. The damage potential is minimized by all of the above ground tanks being within a lined dike capable of holding 150 percent of the tank volume. The liquid level in each underground tank is measured once per shift; preventing overfilling as well as an indication - based on historical experience - of any leakage from underground tanks. In the event of a rupture of an above ground tank, the furnace patrol would report it by telephone to their supervisor, who would initiate the general contingency plan. Telephones are located within 100 yards of each of the tanks. The ruptured tank would then be isolated from the system to avoid an overflow of the dike. Once again, the absence of any significant acid source in the vicinity of the storage tanks precludes the existence of critical environmental situation. A commercial waste hauler is on 24-hour call and would be directed to pump the material from the diked area and dispose of it in the quench tower wet well or, if necessary, off-site at an approved disposal facility.

ERY

END

OVER

BATT. 2

END

OVER

END

OVER

DX

END

OVER

OFFTAKE
MAIN

HAZARDOUS
WASTE

OFFTAKE
MAIN

HAZARDOUS
WASTE

R



WATER TREAT TANK

P.I.V.



WATER TREAT TANK



WATER TREAT TANK



WATER TREAT TANK



WATER TREAT TANK

G

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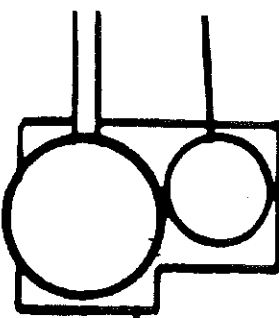
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FIRE EXTINGUISHERS

XX-2 FLOOR

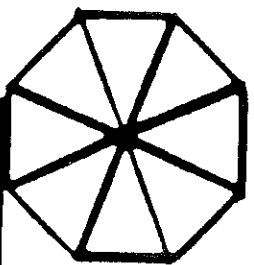
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ASH
SILOS



TANK

WATER TREAT TANK



TANK

ENVIRON.



QUENCH
TANK



75

EMISSIONS

MECHANICAL
SHOP

TRAILER

54

COAL AND
COKE LAB.

Q. CAR
REPAIR

ENVIRON.
TANK

389

62

CONVEY

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F-F BLDG.
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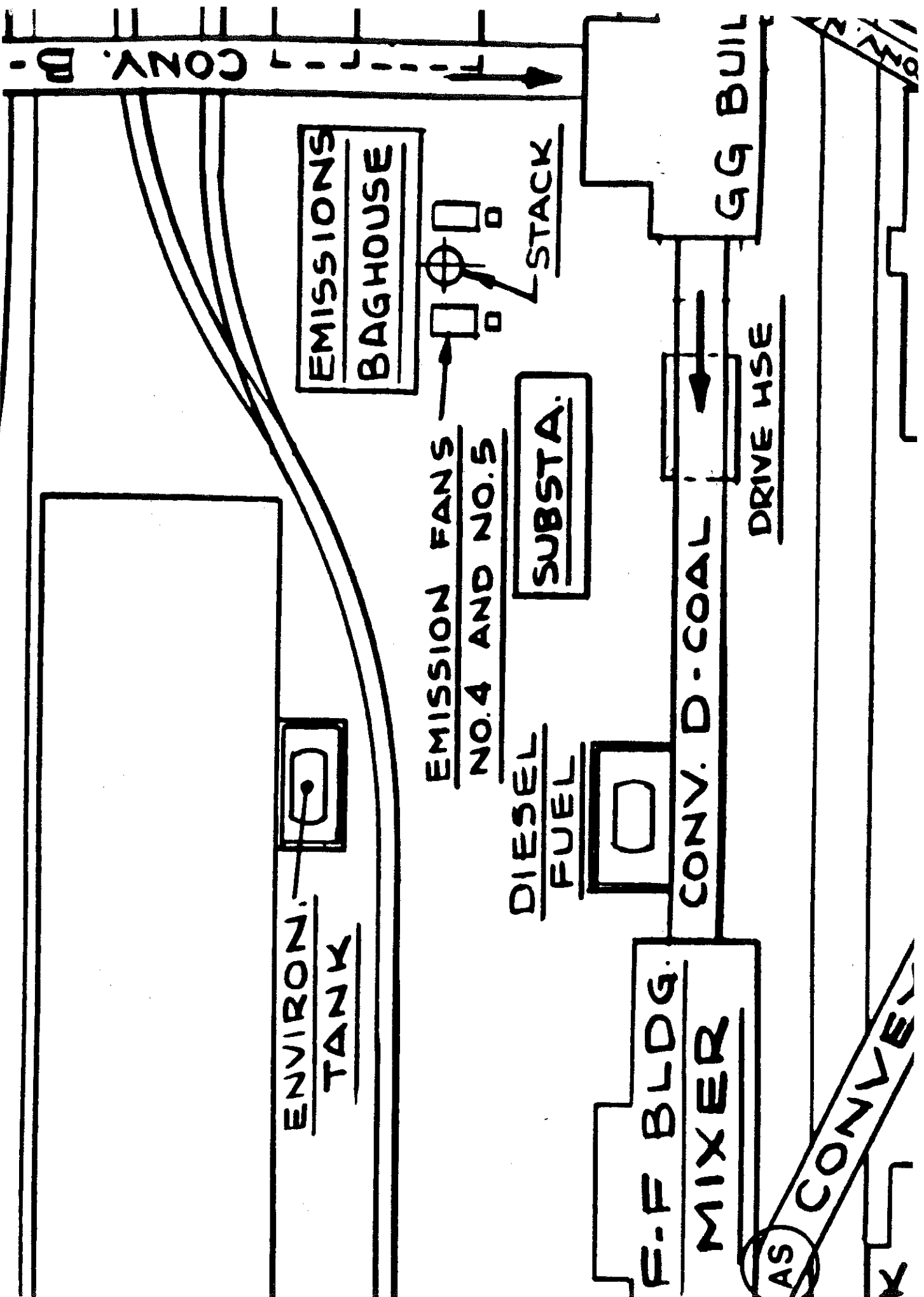
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GG BUIL

DRIVE HSE

AS CONVE

STACK



HAZARDOUS MATERIALS INVENTORY

Material: Final Cooler Water.

Type of Storage: Storage is on an in-process basis because of on-site disposal.

Location: WW Pump House

Method of Disposal: Deep-well injection on-site.

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Ovens - Final Cooler Water

Description

From Coke Oven gas final coolers; normally disposed of by deep well injection; pumped from Pump House west of final coolers to deep well east of Coal Road.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	90°C	-	No
. Corrosive	8.0	10.47	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	No Reaction	No
Caustic	-	No Reaction	No
Cyanide	940	-	Yes
Sulfide	220	-	Yes
Explosive	-	-	No
. Toxic			
Arsenic	0.002	0.1	No
Barium	0.05	0.001	No
Cadmium	0.02	0.1	No
Chromium	0.02	0.05	No
Lead	0.02	0.1	No
Mercury	0.0008	0.03	No
Selenium	0.002	0.1	No
Silver	0.01	0.3	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003 (Reactive: Cyanide/Sulfide)
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 55

HEALTH HAZARDS

Poisonous; may be fatal if inhaled, swallowed or absorbed through skin.
Contact may cause burns to skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control water may give off poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Cylinder may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Ventilate closed spaces before entering them.
Wear **positive pressure** breathing apparatus and special protective clothing.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Fight fire from maximum distance.
Dike fire control water for later disposal; do not scatter the material.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material
and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container
and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

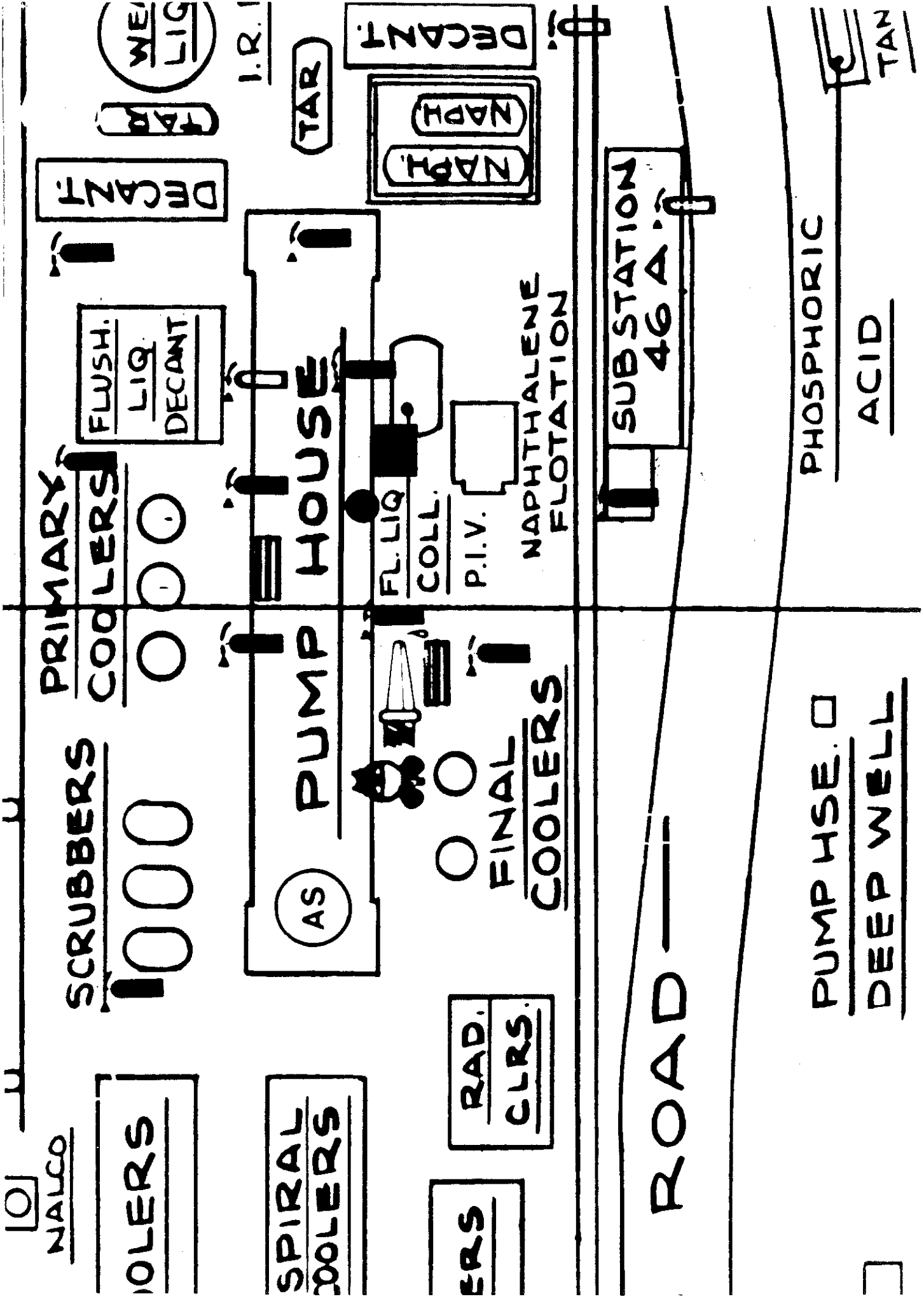
Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin or eyes with running
water for at least 15 minutes.
Speed in removing material from skin is of extreme importance.
Remove and isolate contaminated clothing and shoes at the site.
Keep victim quiet and maintain normal body temperature.
Effects may be delayed; keep victim under observation.

*NOTE: This information is taken from the "1984 Emergency Response
Guidebook;" Dept. of Transportation Publication DOT P 5800.3

CONTINGENCY PLAN
Final Cooler Water

This is a clear, colorless material with an odor of naphthalene or "mothballs." It is non-flammable, non-corrosive, and relatively non-toxic. Its hazardous designation derives from the potential for the release of toxic gases in acidic media. The material is disposed of on-site by deep well injection as it is generated. There is no storage system. There is an operator on duty at all times who visually inspects the integrity of the piping system. The operator also inspects the injection well pumphouse each hour.

In the event of a piping failure resulting in a spill of material, the liquid would travel to a drainage tunnel between WW and XX buildings. The material would be processed first in the AC Stills and finally in the treatment plant for removal of cyanide and phenol. The only hazard with respect to this material is the potential for generation of toxic fumes if mixed with an acidic solution. There is no significant source of acid in any of the areas where this material would potentially flow.



HAZARDOUS MATERIALS INVENTORY

Material: Electric Furnace Dust

Type of Storage: Silo

Location: South end of Electric Arc Furnace Building

Method of Disposal: Removed by licensed hauler on a daily basis when furnace is in operation. Treated at a licensed treatment facility, and disposed of at a licensed disposal facility.

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Electric Furnace Dust

Description

Emission control dust from baghouse from primary production of steel in Electric Furnace.

This material is a dry, reddish brown, odorless, powdery solid.

Hazardous Characteristics

	Lab #1	Lab #2	Hazardous ?
. Ignitable	90°C	-	No
. Corrosive	N.A.	12.4	No
. Reactive			
Unstable	-	-	No
Water		**	No
Acid		**	No
Caustic	-	-	
Cyanide	Non Reactive	-	No
Sulfide	Non Reactive	-	No
Explosive	-	-	
. Toxic Mg/l			
Arsenic	0.007	0.1	No
Barium	0.61	0.5	No
Cadmium	0.32	0.1	No
Chromium	0.10	0.1	No
Lead	0.75	7.0*	Yes
Mercury	0.0002	0.1	No
Selenium	0.016	0.1	No
Silver	0.02	0.1	No
Zinc	490.00	0.7	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous waste, solid, N.O.S. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	K061
. Other	Contains Lead and Zinc
. Hauler/ID	Michigan Disposal, Inc. MID000724831
. Disposer/ID	Michigan Disposal, Inc. MID00724831

*Greater than allowable concentration (5.0), Mg/l

Lab #1 1985

**No violent reaction

Lab #2 1986

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sl241

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 32

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
May burn rapidly with flare-burning effect.

HEALTH HAZARDS

Fire may produce irritating or poisonous gases.
Contact may cause burns to skin and eyes.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, sand, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Magnesium Fires: Use dry sand, Met-L-X powder or G-1 graphite powder; **do not use water.**

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Do not touch spilled material.
Small Dry Spills: With clean shovel, place material into clean, dry container and cover; move containers from spill area.
Large Spills: Wet down with water and dike for later disposal.

FIRST AID

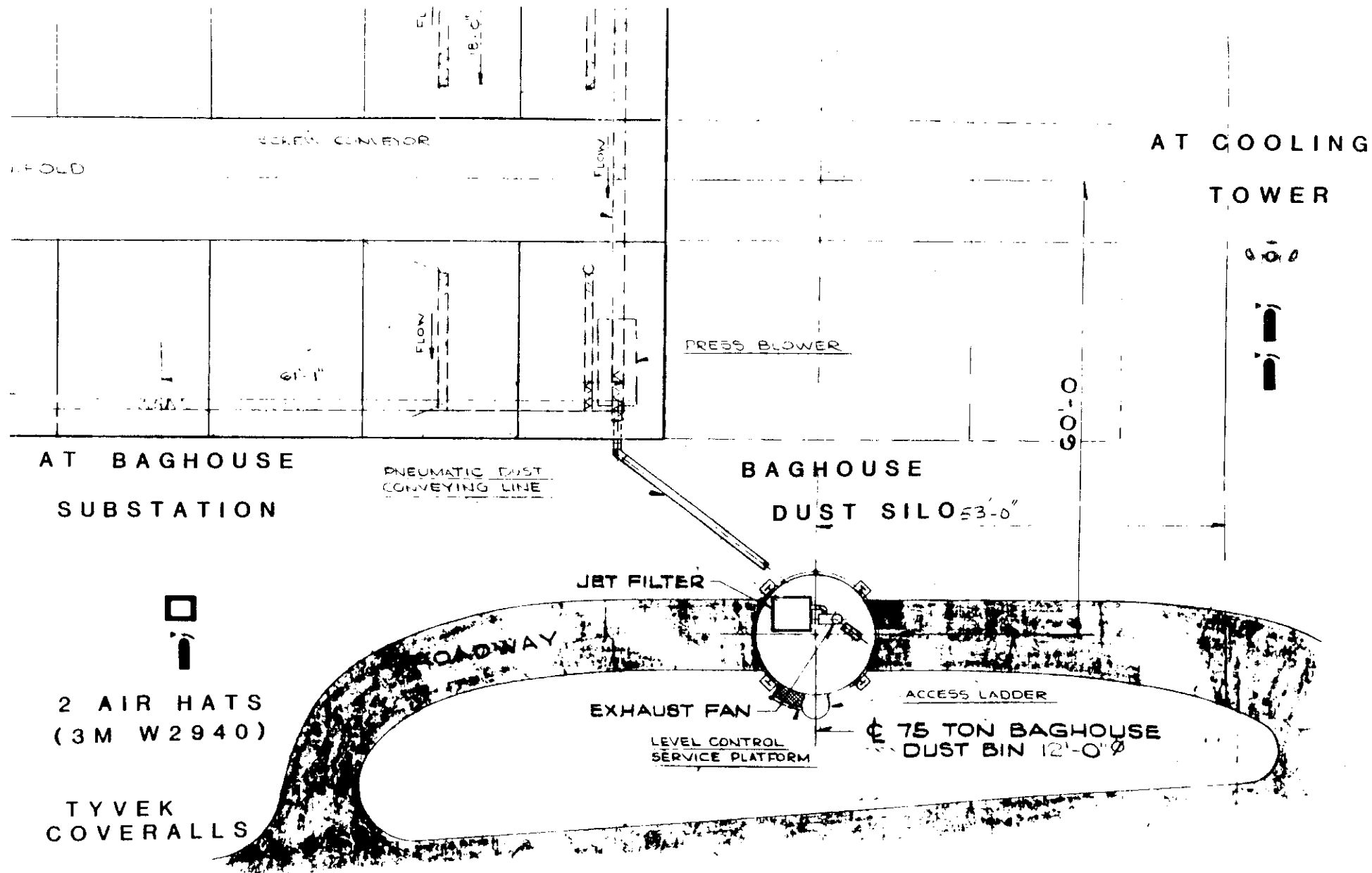
Move victim to fresh air; call emergency medical care.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

CONTINGENCY PLAN
Electric Furnace Dust

This material is a dry, reddish brown, odorless, powdery solid. It is non-flammable, non-corrosive, non-reactive, and relatively non-toxic. Its hazardous designation is derived generically, since most wastes generated from such a process exceed the Extraction Procedure Toxicity limits (EP toxicity). The extract concentrations will depend in large part on the characteristics of scrap material being fed to the system. A given sample may not exceed any of the hazardous waste characteristics. If there is an exceedance, it would be in the EP toxicity test, and the material is subsequently non-toxic in the dry condition.

A dust man is on duty at the storage silo whenever the electric furnace is operating and/or a disposal truck is being loaded. In the event of a spill, the dust man is to wet down the material to minimize windblown transport. A water tap and hose is located adjacent to the storage silo. Tarps may be obtained from the Crib in Building F-36 to cover the material. The dust man is to notify the Stock Receiving Supervisor who would in turn direct the outside contractor to remove the material to the off-site disposal area. Two front end loaders are available on-site at all times to assist in any clean-up activities. Shovels, hard hats, masks, respirators, and Self Contained Breathing Apparatus (SCBA) are available in the Crib which is located approximately 100 feet from the storage silo.



PLAN

M
SH. 44

ELECTRIC ARC FURNACE

HAZARDOUS MATERIALS INVENTORY

Material: Light Oil Muck
Type of Storage: 2 - 10,000 gallon tanks
Location: Coke oven area - east of Light Oil Building
Method of Disposal: Removed by licensed waste hauler

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Ovens - Light Oil Muck

Description

Coke oven gas is "washed" with wash oil to remove light oils. Light oils are removed from wash oil by distillation. Wash oil is decanted. The resulting sludge is transferred to light oil muck tanks at the Light Oil Plant for disposal by stabilization and landfilling.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	60°C	100°C	Combustible
. Corrosive	7.2	5.6	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	HC1	No
Caustic	-	N	No
Cyanide	0.15 mg/l	1.0	No
Sulfide	Negative	-	No
Explosive	-	-	No
. Toxic			
Arsenic	0.002	0.1	No
Barium	0.08	0.1	No
Cadmium	0.02	0.1	No
Chromium	0.06	0.1	No
Lead	0.02	0.1	No
Mercury	0.0002	0.1	No
Selenium	0.002	0.1	No
Silver	-	-	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous waste, liquid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	D003
. Other	Contains a trace of cyanide and benzene
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 27

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

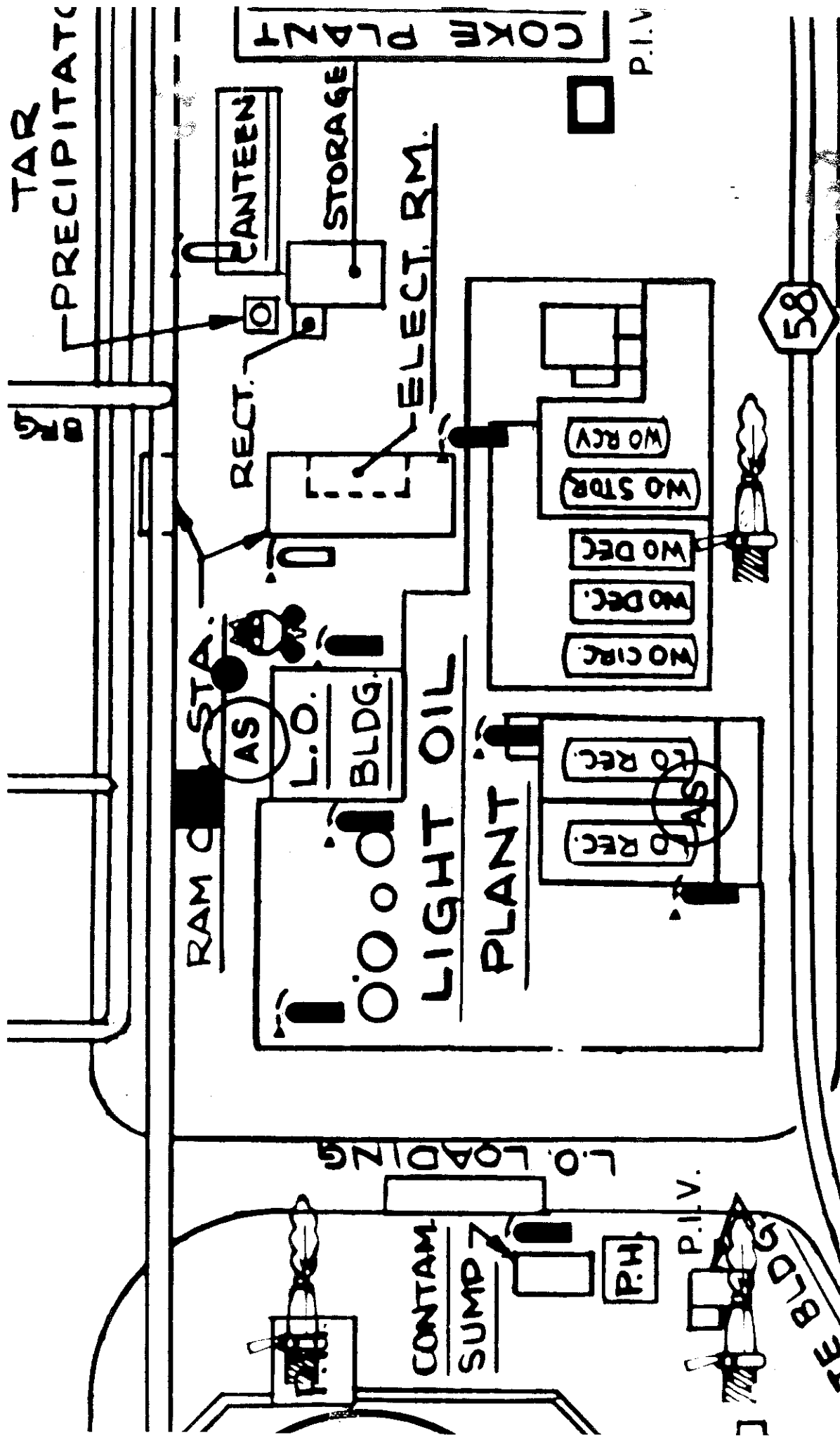
*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Light Oil Muck

This is a brownish-black, "oily" liquid with a coal-tar type odor. It is hazardous because it's ignitable. The muck tanks are contained within lined dikes. Any leaks would be contained and subsequently collected and disposed of by a licensed waste contractor.

In the event of fire, there is an alarm box located outside of the Light Oil Building, which is adjacent to the tanks. This alarm box signals the Dearborn Fire Department, which has been informed that this particular area requires foam apparatus for extinguishing fires. There are also three foam fire stations with hose reels located around the periphery of the tanks at a distance of 50 to 200 feet. These would be used by Light Oil personnel to try to contain any fire until the arrival of the fire department.



MA—SAMPLE HOUSE

MA—TRAILER

HAZARDOUS MATERIALS INVENTORY

Material:	Coke Oven - Tar Storage Sludge
Type of Storage:	Accumulates in Tar Storage Tanks until tanks are cleaned - material removed from site as cleaning is performed.
Location:	Tar Tank Farm South of Light Oil Plant
Method of Disposal:	Hauled by Licensed Hauler to Licensed Landfill

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Coke Oven - Tar Storage Sludge

Description

Tar is collected from the flushing liquor decanter and pumped to tar storage tanks south of the light oil plant. Accumulated tar is pumped from these tanks to barges. Residual sludge from the tanks is normally disposed of by landfilling.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	-	138°C	No
. Corrosive	-	6.2	No
. Reactive			
Unstable	-	-	No
Water	-	-	No
Acid	-	HCl	No
Caustic	-	NaOH	No
Cyanide	-	-	No
Sulfide	-	-	No
Explosive	-	-	No
. Toxic			
Arsenic	-	0.1	No
Barium	-	0.1	No
Cadmium	-	0.1	No
Chromium	-	0.1	No
Lead	-	0.1	No
Mercury	-	0.4	No
Selenium	-	0.2	No
Silver	-	0.1	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Hazardous Waste, solid, n.o.s. NA9189
. Hazard Class	ORM-E
. Hazardous Waste Number	K087
. Other	Contains Phenol and Napthalene
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 27

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

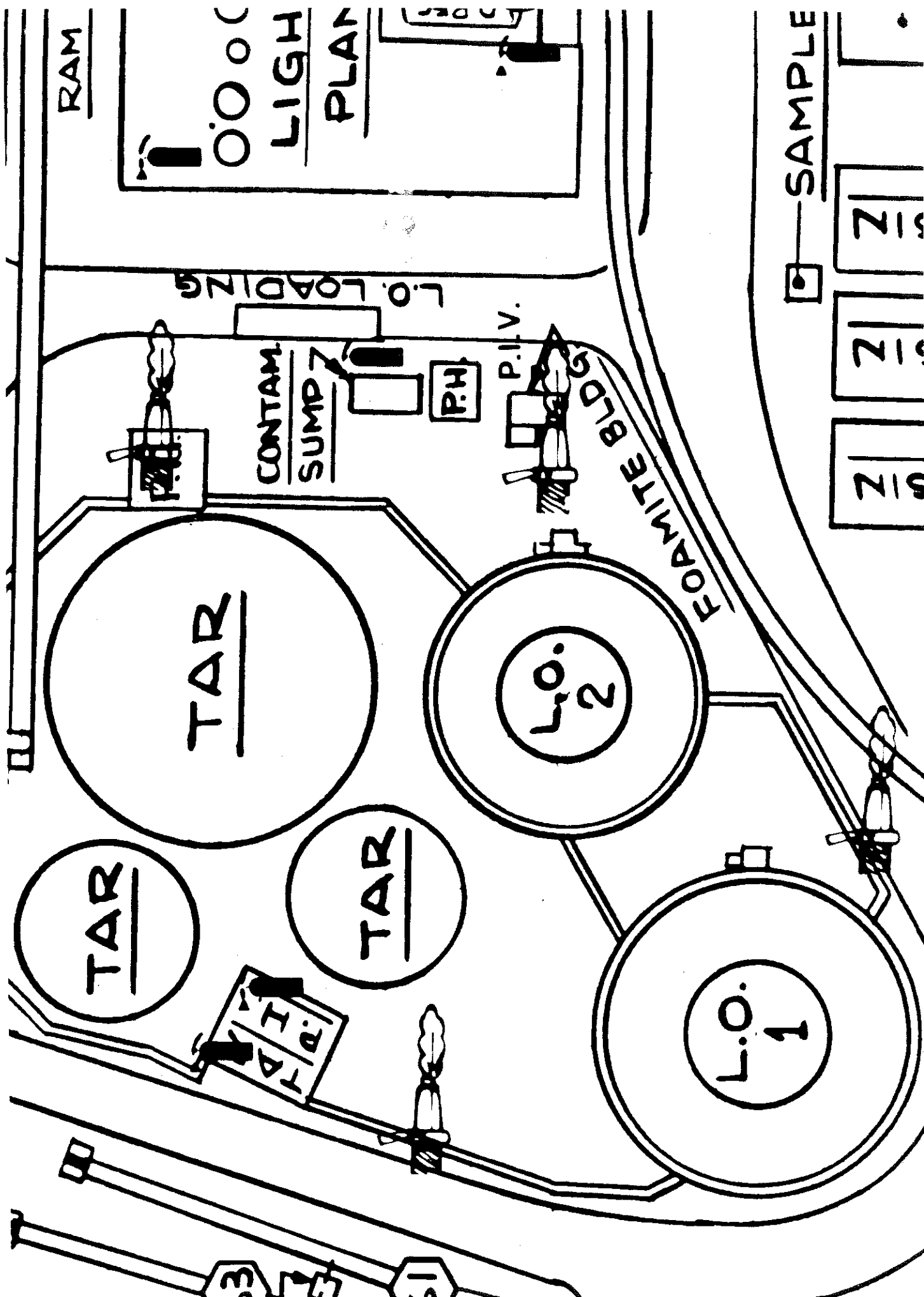
*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Coke Oven Tar Sludge

This material accumulates in the tar storage tanks and must be disposed of when these tanks are cleaned. The three storage tanks are cleaned once every three to six years. The material is essentially a pasty mixture of tar and coke breeze.

The storage tanks themselves are in a diked area, thus there is essentially no way that the residual sludges remaining after the tar is removed could escape from the system. The only risk involved in this material is the possibility of its being ignited. There are foam nozzles inside the tanks to control any fire which might occur prior to the sludge being removed. There is also a foam hose immediately outside the Tar Pumphouse which is adjacent to the tanks, which would be used in case of a fire outside of the tanks.



☒ SAMPLE

Z	Z	Z	Z
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HAZARDOUS MATERIALS INVENTORY

Material: Mineral Spirits

Type of Storage: Self-Contained Cleaning Systems; Service by
Outside Contractor

Location:

	<u>SHOP</u> <u>LOCATION</u>	<u>BRAND</u> <u>NAME</u>	<u>NO. OF</u> <u>UNITS</u>
Hi-Lo	OH 36	SK* 1	
	OH 41 North	SK	1
	OH 41 DC**	1	
	OH 41 South	SK	1
Cold Mill Hi-Lo Shop	Y72	SK 1	
J-9 Instrument	Instrument Shop	Rotunda	1
J-9 Electrical	H17 (Mezzanine)	Rotunda	1
J-9 Crane Repair	H-19 (Second Floor)	Rotunda	1
J-9 Machine Shop	C24,25 North	RS***	1
J-9 Machine Shop	D14 South	SK	1
J-9 Paint Shop	Warehouse	SK	1
Hot Strip Mill	H78, B54, G32	SK	3
Power House	4th Floor Shop	SK	1

*SK-Safety Kleen
 **Dyna Clean
 ***Fabricated by Rouge Steel

Method of Disposal: Recycled by Licensed Hazardous Waste
Disposal Facility

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Mineral Spirits (Petroleum Naptha)

Description

Maintenance areas at the Coke Ovens, Power House and J-9 Shops (Main, Warehouse, Hi-Lo Garage) use parts washers containing mineral spirits. This material is handled by Safety-Kleen. (See attached sheet for specific locations)

Hazardous Characteristics

	<u>Lab #1*</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	105°F		Combustible
. Corrosive	N/A		No
. Reactive	No		No
Unstable	Stable		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	-		No
Sulfide	-		No
Explosive	-		No
. Toxic			
Arsenic	-		No
Barium	-		No
Cadmium	-		No
Chromium	-		No
Lead	-		No
Mercury	-		No
Selenium	-		No
Silver	-		No

*MSDS - Safety Kleen

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste Petroleum Naptha (UN1255)
. Hazard Class	Combustible
. Hazardous Waste Number	D001
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 27

FIRE OR EXPLOSION

Flammable/combustible material; may be ignited by heat, sparks or flames.
Vapors may travel to a source of ignition and flash back.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

May be poisonous if inhaled or absorbed through skin.
Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles; if this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

SPILL OR LEAK

Shut off ignition sources; no flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Remove and isolate contaminated clothing and shoes at the site.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

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CONTINGENCY PLAN
Mineral Spirits

Mineral spirits is used as a degreasing fluid, paint brush cleaner and all-around oily parts cleaner. Most tanks holding mineral spirits are owned and maintained by the Safety-Kleen Company. Other tanks, Rotunda-type or Rouge Steel fabricated, are maintained by Safety-Kleen.

Spilled material is to be contained; held in one place and prevented from entering sewers or confined spaces. Collect this material with pumps or vacuum systems and return it to the original container. If absorbents must be used, put the wet absorbent material in a drum and mark as "Hazardous Waste, solid, n.o.s. - NA9189, ORM-E."

If the mineral spirits system is damaged - leaking reservoir, drum or tub, contain the spill and pump liquid mineral spirits to a clean holding drum. Absorbed mineral spirits should be handled as above. Notify Safety-Kleen to come out and repair their system. They should pump out the holding drum and return the mineral spirits to their site for reclamation.

Notify Security immediately of all mineral spirits spills.

DING

PARKING

LOT NO. 34

IND. SAFETY OFFICE
(ABOVE)
LUNCH & LOCKER RM.
(BELOW)

OH AREA

OIL STORAGE

FUEL OIL
600,000
GALS.

FUEL OIL
257,000
GALS.

M-5
FUEL OIL
150,000
GALS.

6

ONE
STX
TRK
RTR

CONC.
MAT
SHP

TRUCK REPAIR AREA

S K S K S K

S K

SPARE PARTS STORAGE

CONC.
MAT

MR
CRUSH

SCALE
PITS

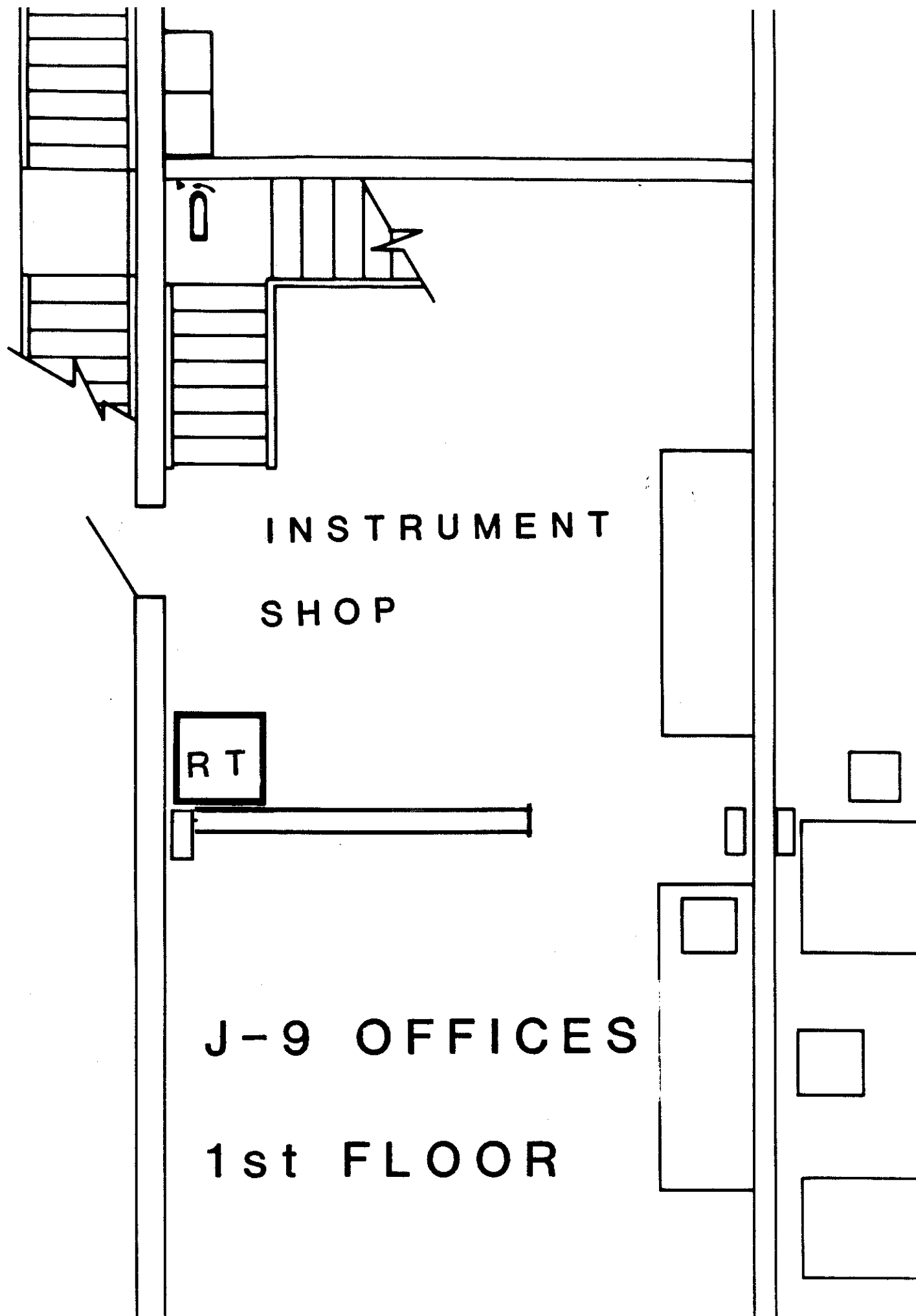
BUTT
STOR

BUTT
STOR

SECTION

SCRAP

OFFICE
STOR.
CARTERS
SHOP



CRANE REPAIR
(2nd FLOOR)

RT

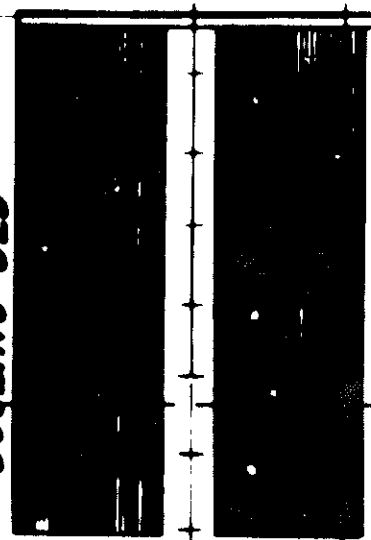
RT

ELECTRICAL
(MEZZANINE)



SK

COOLING BED



SOAKING PIT CONTROL BALCONY ABOVE

MINERAL SPIRITS
DIP TANK

MECHANICAL
MAINTENANCE



AUTO
CARBON
DIOXIDE

J-9
OFFICES



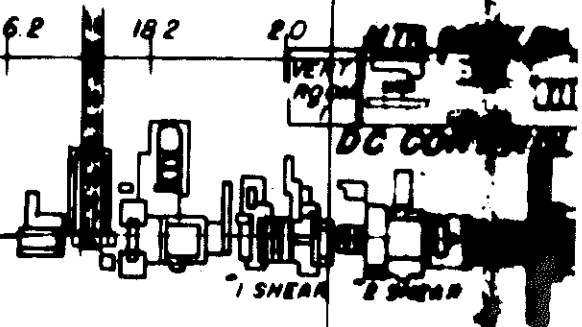
NYD
CELLAR

TOILET

SUB 246-24N

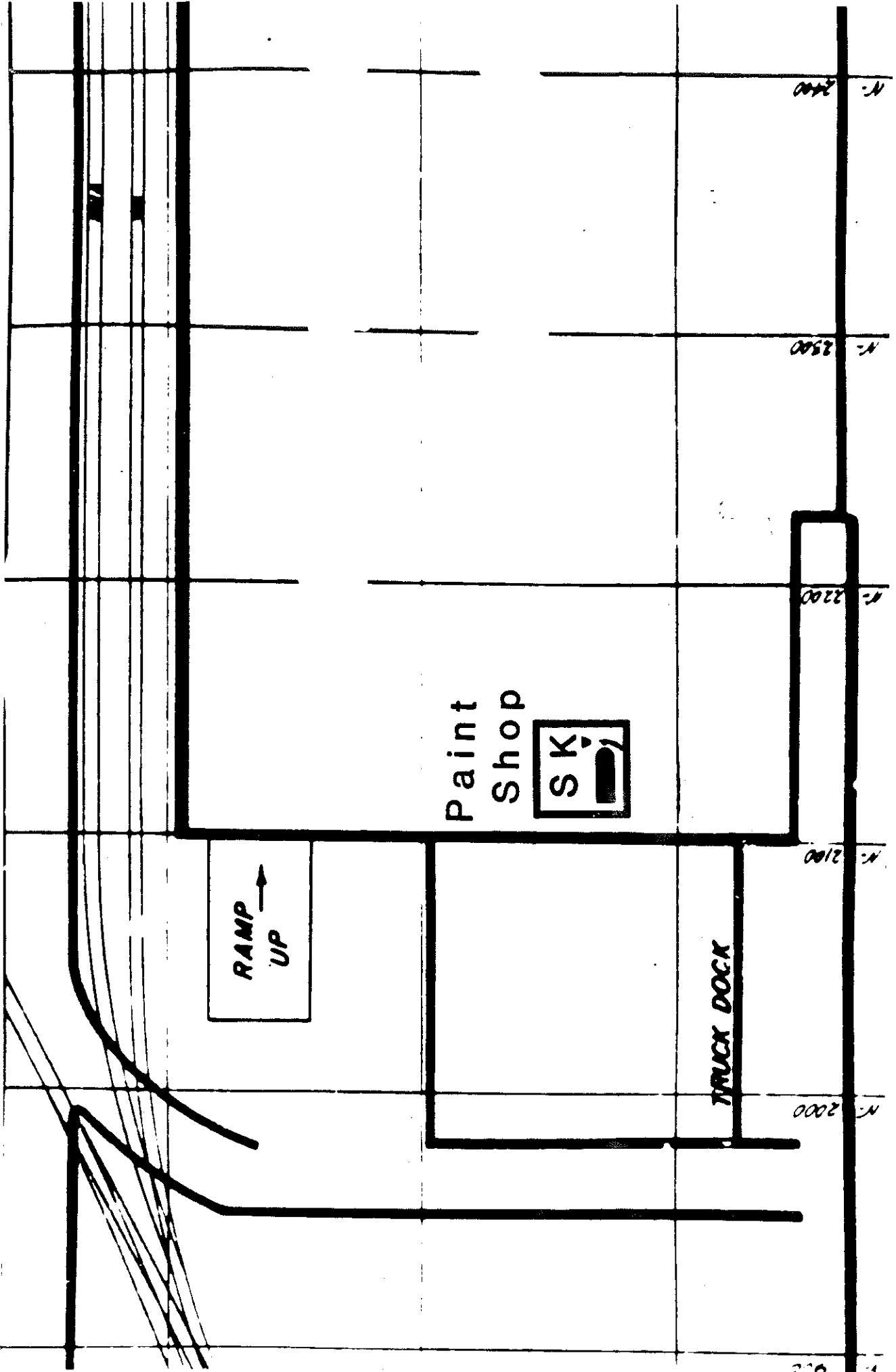
TRANS

J-9 Shops

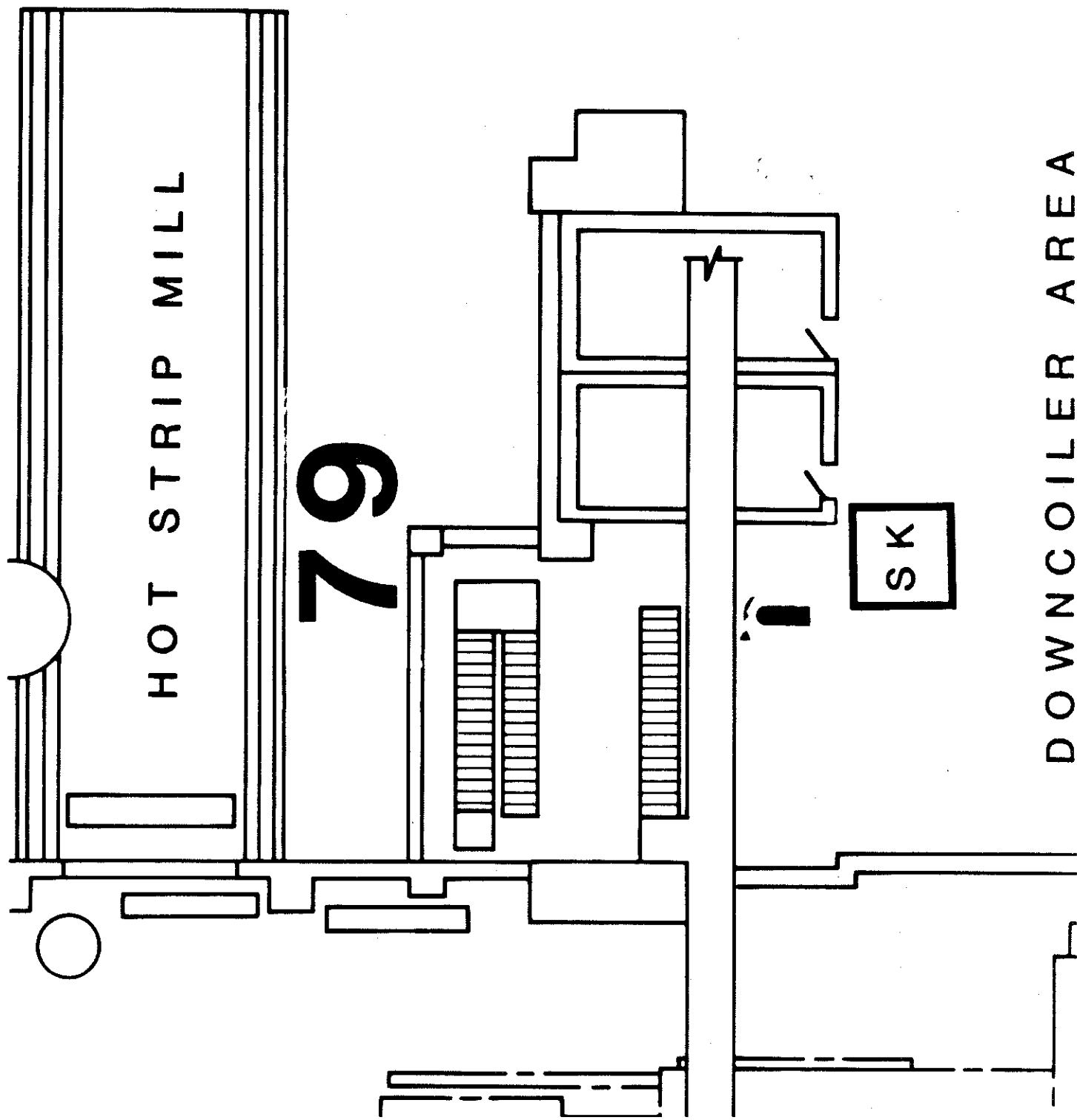


ROLL GRINDERS
SHOT BLAST

60"

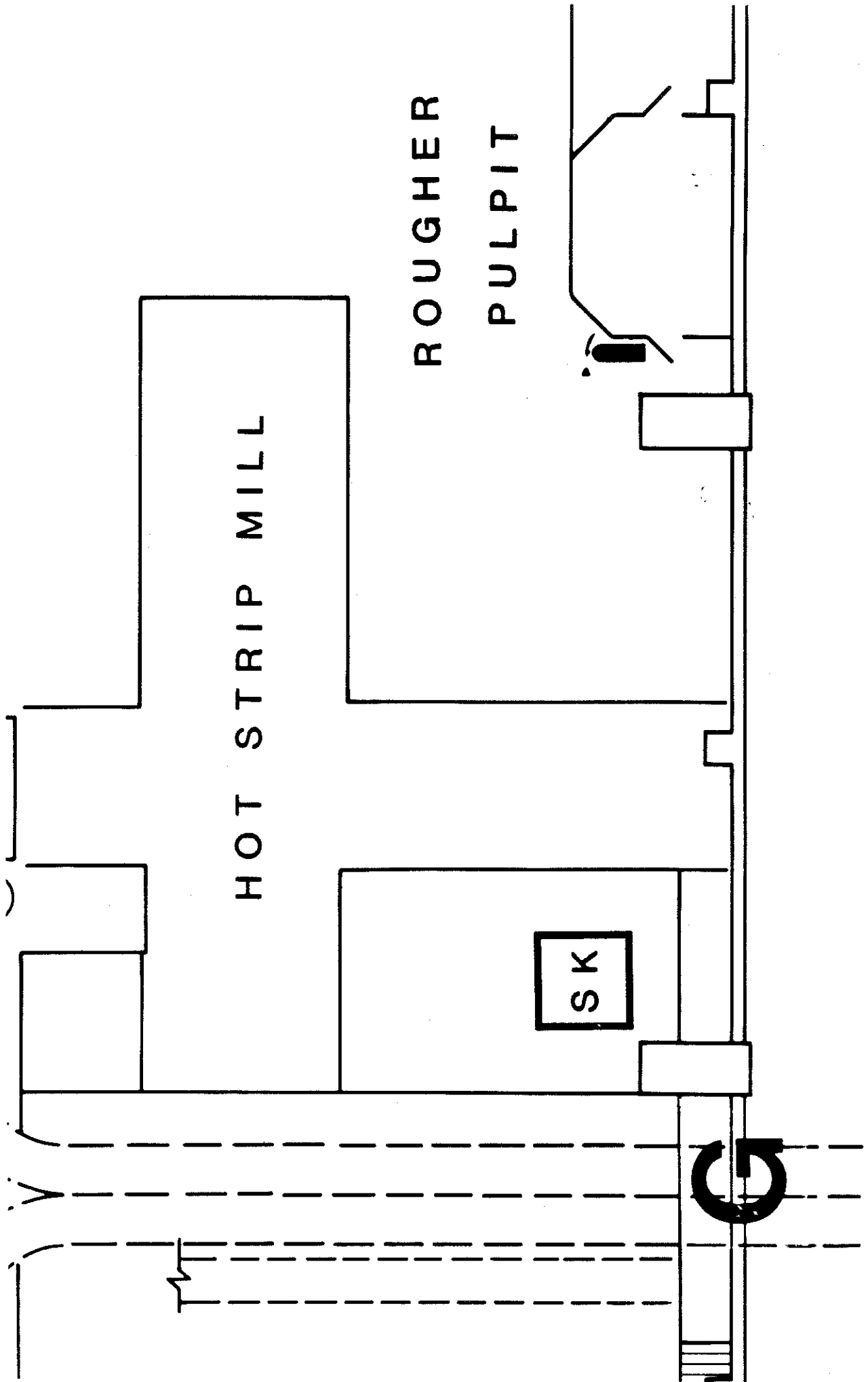


Paint Shop at ROW



H





20

SUMP

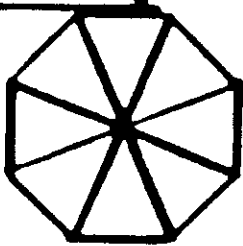
QUENCH
STA.



QUENCH
TANK



ENVIRON.
TANK



WATER TREAT.
TANK

ASH
SILOS

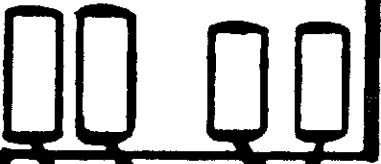


4th FLOOR



SK

MECH.
ROOM



CONDENSATE TANKS

CAUSTIC TANK

SULFURIC ACID TANK

POWER HOUSE

NO. 1

10

EXTINGUISHERS

HAZARDOUS MATERIALS INVENTORY

Material: Waste Pickle Liquor

Type of Storage: 3 - 40,000 gallon above ground rubber lined tanks, underlain by 5 feet of limestone.

Location: Pickle Acid Tank Farm, West of Steel Mills, F56.

Method of Disposal: Removed by commercial vendor at a rate of approximately one million gallons per month.

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Pickle Liquor

Description

This material is used as a surface treatment for finished steel. When wasted from the pickling tanks, it is stored in above ground tanks between the Steel Mill Plant and Slab Handling Yard.

Hazardous Characteristics

	<u>Lab #1</u>	<u>Lab #2</u>	<u>Hazardous ?</u>
. Ignitable	90°C		No
. Corrosive	1		Yes
. Reactive			
Unstable	-		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	0.29		No
Sulfide	9.1		No
Explosive	-		No
. Toxic			
Arsenic	0.345	0.1	No
Barium	0.05	0.1	No
Cadmium	0.02	0.1	No
Chromium	17.0	4.3	Yes
Lead	6.4	0.1	Yes
Mercury	0.004	0.03	No
Selenium	0.240	0.1	No
Silver	0.18	0.3	No

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste Acid, liquid, n.o.s. NA1760
. Hazard Class	Corrosive Material
. Hazardous Waste Number	K062
. Other	Contains Chromium (D007) and Lead (D008)
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Environmental Waste Control MID057002602

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 60

HEALTH HAZARDS

Contact causes burns to skin and eyes.
If inhaled, may be harmful.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Flammable/poisonous gases may accumulate in tanks and hopper cars.
Some of these materials may ignite combustibles (wood, paper, oil, etc.).

EMERGENCY ACTION

Keep unnecessary people away; isolate hazard area and deny entry.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Some of these materials may react violently with water.
Small Fires: Dry chemical, CO₂, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.

SPILL OR LEAK

Do not touch spilled material; stop leak if you can do it without risk.
Small Spills: Take up with sand or other noncombustible absorbent material and place into containers for later disposal.
Small Dry Spills: With clean shovel place material into clean, dry container and cover; move containers from spill area.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
Remove and isolate contaminated clothing and shoes at the site.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Keep victim quiet and maintain normal body temperature.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

RESPONDENT'S EXHIBIT

14

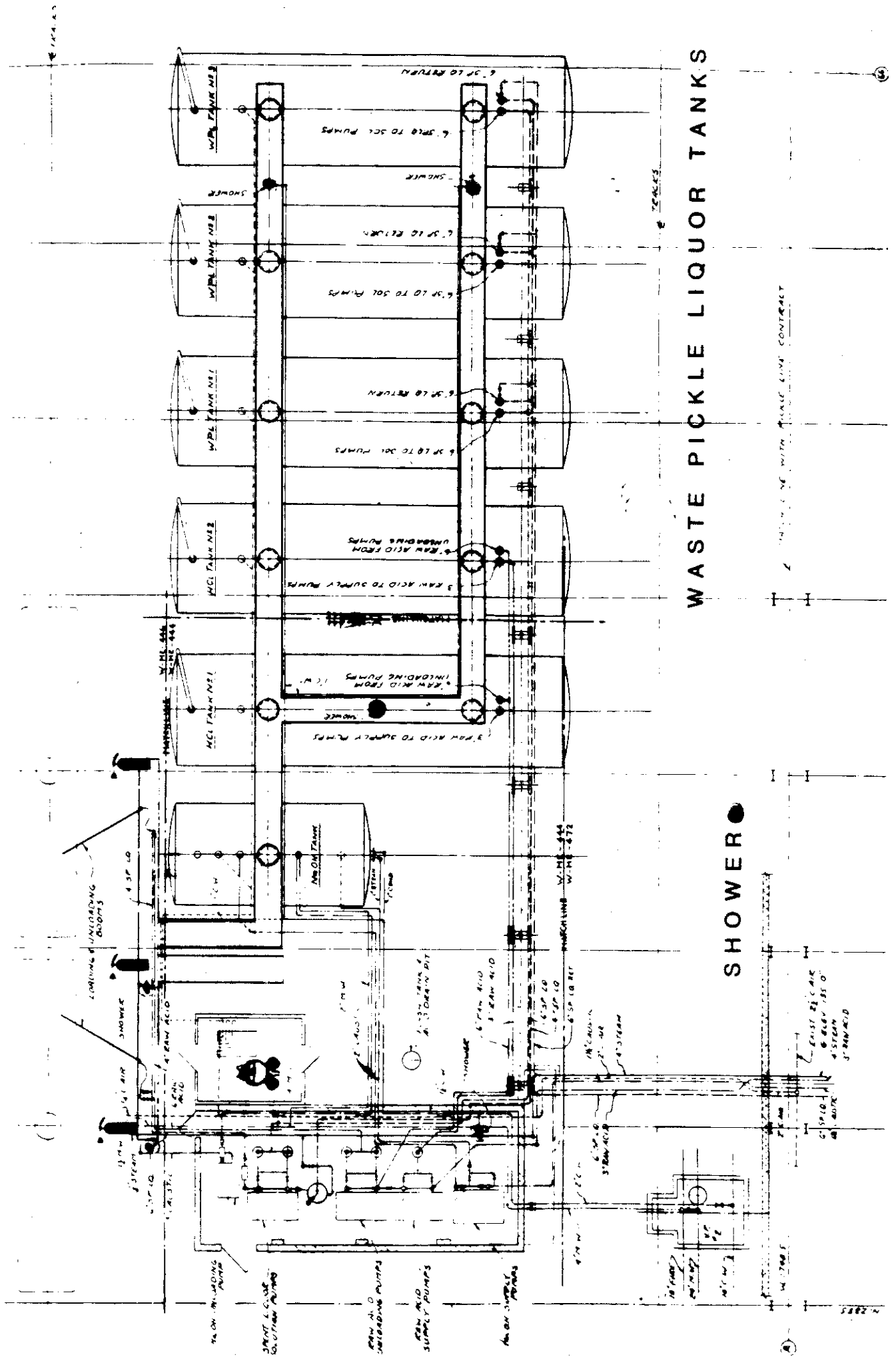
CONTINGENCY PLAN
Waste Pickle Liquor

The waste pickle liquor is a non-flammable, greenish liquid with an acidic odor, which is stored in three 40,000 gallon above ground, rubber lined steel tanks. These tanks, along with two similar sized tanks of fresh hydrochloric acid and a smaller tank of caustic soda, are underlain by a five foot deep bed (approximately 4,000 tons) of limestone. Assuming the limestone is 75 percent CaCO_3 , this quantity is theoretically capable of neutralizing approximately 800,000 gallons of pure hydrochloric acid, and thus sufficient to neutralize leaks from this system.

The acid Tank Farm is located West of the Steel Mills, Building F56. As such, it is physically isolated by both distance and the boat slip, from those wastes on-site which can generate toxic fumes when in an acidic solution. The facility is equipped with six dosing showers, two eye wash stations, and two fire extinguishers. Immediately adjacent to the tanks is the attendant's office, within which are found tank level gauges, telephone, two self-contained breathing apparatuses (SCBA), hard hat with face shield, acid gloves, and shovels.

There is a Tank Farm attendant on duty twenty-four hours per day. In the event of a major spill, he would first call the foreman, who would initiate the general contingency program. If the spill were to prevent the attendant from entering the office, there are two additional telephones within 100 yards of open area that could be used. As noted above, the Tank Farm is underlain by a bed of limestone sufficient to hold and neutralize the total contents of the Tank Farm. Should a small amount of the acidic material be splashed outside the limitations of the bed, a high volume hose is available to flood the surrounding area with water. The neutralized material would flow to the Schaefer Road Treatment Facility by means of existing sewers, and would ultimately discharge from the Treatment Plant outfall.

Any limestone losses resulting from a spill will be replaced by a stock of fresh limestone located approximately 50 yards from the Tank Farm. A front end loader is available from the Coke Plant, which could be brought to the Tank Farm within 10 to 15 minutes.



WASTE PICKLE LIQUOR TANKS

SHOWER

CONNECTION WITH PICKLE LINE CONTRACT

HAZARDOUS MATERIALS INVENTORY

Material: Waste Halogenated Solvents
Type of Storage: DOT Approved Drums
Location: Powerhouse (1, 1, 1 Trichloroethane)
Oxygen Plant (Methylene Chloride)
Method of Disposal: Licensed Hauler as Needed; Sold for Reclaim

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

1, 1, 1 Trichloroethane

Description

Power House maintenance shop uses this material as a degreasing fluid for small parts cleaning. These small amounts generally evaporate from part surfaces.

Hazardous Characteristics

. Ignitable

Lab #1

Lab #2

Hazardous ?

-

No

. Corrosive

-

No

. Reactive

Unstable

-

No

Water

-

No

Acid

-

No

Caustic

-

No

Cyanide

-

No

Sulfide

-

No

Explosive

-

No

. Toxic

Arsenic

-

No

Barium

-

No

Cadmium

-

No

Chromium

-

No

Lead

-

No

Mercury

-

No

Selenium

-

No

Silver

-

No

Note: This is a specifically listed waste.

Transportation Information for Contaminated Clean Up Material

. DOT Name

Waste 1, 1, 1 Trichloroethane
(UN2831)

. Hazard Class

ORM-A

. Hazardous Waste Number

F002

. Other

. Hauler/ID

Environmental Waste Control
MID057002602

. Disposer/ID

Wayne Disposal MID048090633

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sl24d

ROUGE STEEL COMPANY
SPCC/PIP PLAN
HAZARDOUS MATERIALS SUPPLEMENT

Hazardous Waste

Methylene Chloride

Description

Oxygen Plant uses this material in a dip degreaser for parts cleaning. As the solvent becomes laden with oily sludge, the unit is cleaned out. Waste material is stabilized and landfilled.

Hazardous Characteristics

Lab #1

Lab #2

Hazardous ?

. Ignitable	-		No
. Corrosive	-		No
. Reactive			
Unstable	-		No
Water	-		No
Acid	-		No
Caustic	-		No
Cyanide	-		No
Sulfide	-		No
Explosive	-		No
. Toxic			
Arsenic	-		No
Barium	-		No
Cadmium	-		No
Chromium	-		No
Lead	-		No
Mercury	-		No
Selenium	-		No
Silver	-		No

Note: This is a specifically listed waste.

Transportation Information for Contaminated Clean Up Material

. DOT Name	Waste Methylene Chloride (UN1593)
. Hazard Class	ORM-A
. Hazardous Waste Number	F002
. Other	
. Hauler/ID	Environmental Waste Control MID057002602
. Disposer/ID	Wayne Disposal MID048090633

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ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
EMERGENCY RESPONSE*

Material:

Guide Number: 74

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Exposure in an enclosed area may be very harmful.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but none of them ignite readily.
Most vapors are heavier than air.
Container may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind; keep out of low areas.
Wear self-contained (positive pressure if available) breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank car or truck is involved in fire.
Remove and isolate contaminated clothing at the site.
FOR EMERGENCY ASSISTANCE CALL Rouge Fire Dept at 23313
If water pollution occurs, notify appropriate authorities.

FIRE

Small Fires: Dry chemical or CO₂.
Large Fires: Water spray, fog or foam.
Stay away from ends of tanks.
Cool containers that are exposed to flames with water from the side until well after fire is out.

SPILL OR LEAK

Stop leak if you can do it without risk.
Shut off ignition sources; no flares, smoking or flames in hazard area.
Small Liquid Spills: Take up with sand, earth or other noncombustible absorbent material.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
Remove and isolate contaminated clothing and shoes at the site.
In case of contact with material, immediately flush eyes with running water for at least 15 minutes. Wash skin with soap and water.
Use first aid treatment according to the nature of the injury.

*NOTE: This information is taken from the "1984 Emergency Response Guidebook;" Dept. of Transportation Publication DOT P 5800.3

CONTINGENCY PLAN
Halogenated Solvents

Two halogenated solvents are used on site. The Power House maintenance area uses 1, 1, 1, Trichloroethane in cleaning solvents for small parts and electrical equipment. Methylene chloride is used as a dip cleaner in the Oxygen Plant.

Spills and leaks are to be contained; prevented from entering sewers or confined spaces. Contained liquids are to be pumped into clean drums and marked as hazardous waste: either

Waste 1, 1, 1 Trichloroethane - UN 2831, ORM-A, F001

or Waste Methylene Chloride - UN 1593, ORM-A, F001

If absorbent is used to contain the spill, the contaminated absorbent must be disposed of as hazardous waste. Place contaminated absorbent in a drum and label the drum:

"Hazardous Waste, solid, n.o.s. - NA9189, ORM-E, F001"

Add to the label and shipping papers the note:

"Contains 1, 1, 1 Trichloroethane"

or "Contains Methylene Chloride"

Notify Security immediately of any spills of these materials.

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EXISTING
COLD BOX

EXIST
TOTAL
WAPPAH

B.H.2

* METHYLENE CHLORIDE
DIP TANK

OXYGEN PLANT

COMPRESSOR BUILDING

EXIST. PIPE
SUPPORT FDN.

EXIST. PIPE
SUPPORT FDN.

6" DRAIN

4415-2109

GR. 61. 100' 0" 115' 10" 120' 0" 125' 0" 130' 0" 135' 0" 140' 0" 145' 0" 150' 0" 155' 0" 160' 0" 165' 0" 170' 0" 175' 0" 180' 0" 185' 0" 190' 0" 195' 0" 200' 0" 205' 0" 210' 0" 215' 0" 220' 0" 225' 0" 230' 0" 235' 0" 240' 0" 245' 0" 250' 0" 255' 0" 260' 0" 265' 0" 270' 0" 275' 0" 280' 0" 285' 0" 290' 0" 295' 0" 300' 0" 305' 0" 310' 0" 315' 0" 320' 0" 325' 0" 330' 0" 335' 0" 340' 0" 345' 0" 350' 0" 355' 0" 360' 0" 365' 0" 370' 0" 375' 0" 380' 0" 385' 0" 390' 0" 395' 0" 400' 0" 405' 0" 410' 0" 415' 0" 420' 0" 425' 0" 430' 0" 435' 0" 440' 0" 445' 0" 450' 0" 455' 0" 460' 0" 465' 0" 470' 0" 475' 0" 480' 0" 485' 0" 490' 0" 495' 0" 500' 0" 505' 0" 510' 0" 515' 0" 520' 0" 525' 0" 530' 0" 535' 0" 540' 0" 545' 0" 550' 0" 555' 0" 560' 0" 565' 0" 570' 0" 575' 0" 580' 0" 585' 0" 590' 0" 595' 0" 600' 0" 605' 0" 610' 0" 615' 0" 620' 0" 625' 0" 630' 0" 635' 0" 640' 0" 645' 0" 650' 0" 655' 0" 660' 0" 665' 0" 670' 0" 675' 0" 680' 0" 685' 0" 690' 0" 695' 0" 700' 0" 705' 0" 710' 0" 715' 0" 720' 0" 725' 0" 730' 0" 735' 0" 740' 0" 745' 0" 750' 0" 755' 0" 760' 0" 765' 0" 770' 0" 775' 0" 780' 0" 785' 0" 790' 0" 795' 0" 800' 0" 805' 0" 810' 0" 815' 0" 820' 0" 825' 0" 830' 0" 835' 0" 840' 0" 845' 0" 850' 0" 855' 0" 860' 0" 865' 0" 870' 0" 875' 0" 880' 0" 885' 0" 890' 0" 895' 0" 900' 0" 905' 0" 910' 0" 915' 0" 920' 0" 925' 0" 930' 0" 935' 0" 940' 0" 945' 0" 950' 0" 955' 0" 960' 0" 965' 0" 970' 0" 975' 0" 980' 0" 985' 0" 990' 0" 995' 0" 1000' 0"

A

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING PROGRAM

Annual hazardous waste management training is required for all Rouge Steel employees who:

- . Handle hazardous waste
- . May handle hazardous waste
- . Supervise hazardous waste handlers
- . Bear responsibility for compliance with Hazardous Waste Regulations

Training is intended to comply with 40 CFR 262.34 (a) 4, 40 CFR 265 Parts C and D, and 40 CFR 265.16

Employees requiring annual training receive one hour of classroom training and general hazardous waste management and a handout with information specific to wastes encountered by each employee. A video tape of the classroom training is available (January, 1987) for employees to use as a refresher (voluntary) and as primary training for new employees and transfers.

Classroom training is developed and conducted by Rouge Steel Environmental Control personnel. The Training Program includes:

- . General environmental awareness
- . Company commitment to compliance
- . General hazard information and precautions
- . Specific information on handling each waste in emergency situations.

It is the intent of the program developers to provide more than the functional training required by regulation. The training should acquaint Rouge Steel employees with the connection between complying with regulations and the quality of their lives at work and at home. Compliance will be most readily and consistently achieved when all employees understand that compliance is in the best interests of the Company and its employees.

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING LIST

GENERAL OFFICE

President
Vice President-Industrial Relations
Vice President-Engineering & Facilities
Vice President-Operations
Manager-Mfg & Environmental Engrg.
Manager-Environmental Control
Senior Environmental Engineer (3)
Environmental Control Engineer (4)

IRON MAKING OPERATION

Manager-Operations
Superintendent-Coke Ovens & By Products
Gen Supervisor-Oven Operation (4)
Supervisor-Ovens (10)
Gen Supervisor-Coal & Coke Handling
Supervisor-Yard Labor (1)
Gen Supervisor-By Products Operation (1)
Supervisor-By Products (4)
Supervisor - Gas Dept. (1)
Engineer-Steel Ops (1)
Super-Coke Ovens & By Prod Maint
Gen Supv-Environmental & Coke Ovens
Elec/Mech Maint (1)
Supv-Coke Ovens Maint (4)
Gen Supv-Coal Coke & By Products &
Projects Maint
Supv-Relief Maint. (2)
Supv-By Products Maint (1)
Supv-Coal & Coke Maint (1)

MELTING OPERATIONS

Manager-Melting Operations
Asst Mgr-Melting Operations
Super-Electric Furnace (1)
Gen Supv-Electric Furnace (1)
Supv-Melter (4)
Engineer-Steel Operations (1)
Superintendent-Maintenance (1)
Gen Supv-EAF Maintenance
Supv-Electric Furnace (4)

FINISHING OPERATIONS

Manager-Finishing Operations
Super-Hot Mills Maintenance (1)
Gen Supervisor-Mechanical (2)
Supervisor-Mechanical (8)
Superintendent-Cold Mills (1)
Gen Supv-Cold Rolling/Pickling (1)
Supervisor-Pickling (6)

INDUSTRIAL RELATIONS

Vice President- Industrial Relations
Manager-Hourly Personnel & Labor Rels Dept
Section Supv-Industrial Safety & Fire
Protection (1)
Office Clerk A
Safety Engineer Sr (3)
Safety Engineer B
Administrative Coord
Fire Prot Specialists (5)

POWER & UTILITIES

Manager-Operations
Superintendent-Production
Gen Supv-Oxygen Plant (1)
Supervisor-Oxygen Plant (3)
Mechanical Distribution & Maint
Gen Supv-Mech Maint (1)
Supv-Mech Maint (3)
Supv-Misc Shops (1)
Gen Supv-Mech Distr & Maint (1)
Supervisor-Mech Dist (4)
Supervisor-Mech Maint (1)

MISCELLANEOUS SHOPS

Superintendent-Misc Shops
Divn Maint Engr
Gen Supv-Crane & Hi-Lo Repair Shops (1)
Supv-Crane Repair (5)
Supv-Hi-Lo Shop (4)
Gen Supv-Electrical Shops (1)
Supv-Instrument Shop (4)
Supv-Carpenter Shop (1)

MARINE OPERATIONS

Superintendent-Marine Operations

ENVIRONMENTAL COORDINATORS

Basic Oxygen Furnace
Blast Furnace
Coke Ovens
Cold Mill
Electric Arc Furnace
Hot Strip Mill
Power House
Roll Shops
Slabbing Mill
Continuous Casting

ROUGE STEEL COMPANY
HAZARDOUS WASTE PLAN
TRAINING LIST

	Occ No.	Occupation Title	Maximum Crew Size		
			1	2	3
CRANE REPAIR - Dept. 1731	16	Millwright Apprentice	V	V	V
	50	Millwright Mechanic	5	18	5
	71	Millwright Apprentice	V	V	V
COLD MILL MAINTENANCE Dept. 1734	32	Plumber - Pipefitter	2	2	2
	37	Mill Maintenance	2	2	2
	68	Mill Maintenance	10	14	10
68" H.S.M. ASSIGN. MAINT. Dept. 1736	60	Mill Maintenance	0	1	0
	80	Mill Maintenance	0	1	0
	85	Electrician	0	1	0
ELECTRIC FURNACE MAINT. Dept 1743	50	Electrician	2	5	2
	51	Plumber-Pipefitter	2	2	2
	52	Millwright	3	6	3
	53	Welder-General	2	2	2
	54	Oiler	0	2	0
	55	Hydraulic Repair	1	1	1
PICKLING GENERAL Dept. 3650	37	Acid Tank Attendant	1	1	1
	60	Cleaner General #3 Pit & Sump	2	2	2
	61	Cleaner-Gen. Dept. Laborer Gr #2	4	4	4
	77	HCL Acid Farm Attendant	0	1	0
POWER - GENERAL Dept. 6701	15	Cleaner-General	0	10	0
	16	Cleaner-P.H. Utility	12	12	12
	17	Cleaner-P.H. Util. Leader	1	1	1

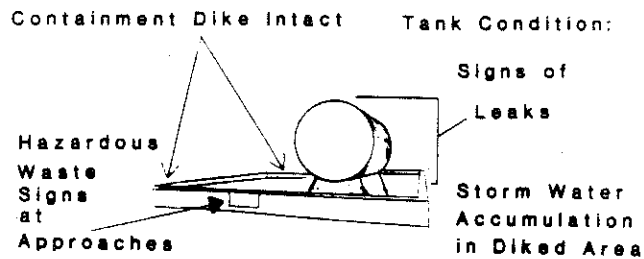
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ELECTRICAL MAINTENANCE Dept. 6711	10	Cleaner-Lamp	0	1	0
MECHANICAL MAINTENANCE Dept. 6712	29	Water Purification System Maint.	0	1	0
	33	Machinist-All Around-Power House	0	9	0
	34	Machinist-All Around-Power House-DR	0	1	0
	36	Millwright	0	6	0
	37	Millwright-Leader	0	1	0
	56	Painter-Glazier-Leader	0	1	0
	57	Painter-Glazier	0	7	0
	58	Painter-Sign	0	1	0
MECHANICAL CONSTRUCTION & MAINTENANCE - Dept. 6717	33	Machinist-All Around-Power House	0	8	0
	34	Machinist-All Around-Power House-DR	0	2	0
	36	Millwright	0	1	0
	63	Plumber-Pipefitter-Apprentice	0	V	0
	66	Millwright Apprentice	0	V	0
WATER TREATMENT Dept. 6729	13	First Class Oper-Power House 1	1	1	1
	15	Second Class Oper-Power House #1	2	2	2
	61	Stationary Steam Apprentice	V	V	V
OXYGEN PLANT - Dept 6738	10	Power Serv-Heat, Steam, Air & Water	4	4	4
	11	Power Serv-Heat, Steam, Air & Water Ldr	1	1	1
	61	Stationary Steam Apprentice	0	1	0
TRANSMISSION & DIST. GEN'L Dept. 6740	15	Cleaner-General	0	9	0
	16	Cleaner-Power House-Utility	0	10	0
	17	Cleaner-Power House-Utility-Leader	0	1	0
ELECTRICAL DISTRIBUTION Dept. 6743	07	Power Electrician	0	2	0
	23	Power Electrician- Leader	0	1	0

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COKE OVENS YARD LABOR	30	Sprayer	0	1	0
Dept. 7030	33	Sump, Tank, Trench Cleaning	0	12	0
	34	Sump, Tank, Trench Cleaning-Leader	0	3	0
	50	Labor	2	9	2
	51	Labor-Utility	0	1	0
	56	Sweeper, Cleaner & Janitor	1	8	1
	58	Washer-Window (Scaffold)	0	2	0
COAL CHEMICAL-GENERAL	35	Apparatus Operator	2	3	2
Dept. 7250	45	Engineer-Licensed	1	2	1
COAL CHEMICAL-TAR	40	Light Oil Operator	0	1	0
Dept. 7251					
COAL CHEMICAL-CRUDE	25	Light Oil Operator	1	2	1
LITE OIL - Dept. 7252					
COAL CHEMICAL AMMONIUM	11	Sulphate Operator-Relief	1	1	1
SULPHATE - Dept. 7253	15	Sulphate-Operator	1	1	1
	30	A.C. Still Operator	1	1	1
COAL CHEMICAL NAPHTHALENE	10	Naphthalene Operator	1	1	1
Dept. 7255					
COAL CHEMICAL-MIXED GAS	45	Engineer-Licensed	2	2	2
DISTRIBUTION - Dept. 7260					
MIXED GAS DISTRIBUTION	11	Gas Dispatcher	1	1	1
SERVICE - Dept. 7261	22	Furnace Patrol	2	6	2
COAL CHEMICAL SULPHATE	31	Sulphate Dryer Operator-Leader	0	1	0
BAGGING - DEPT. 7270					

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Gas Line Drip Water Tank
N. Quench Tower

Hazardous Waste Inspection

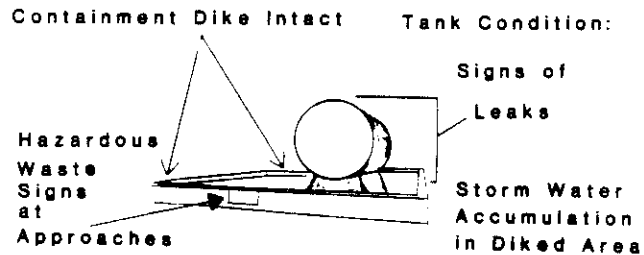
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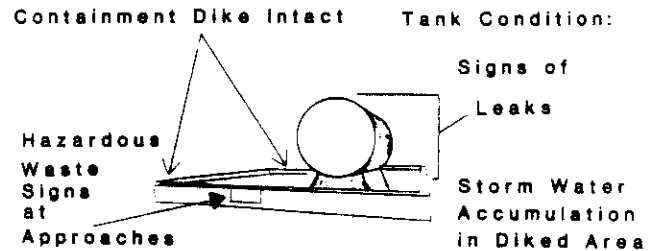
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Dept #

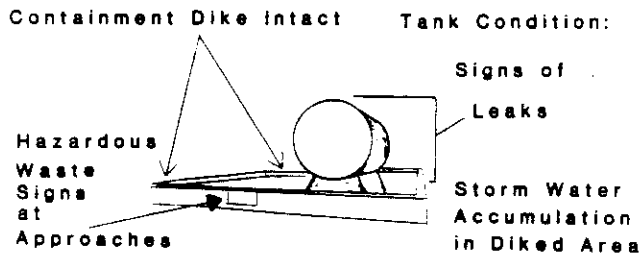
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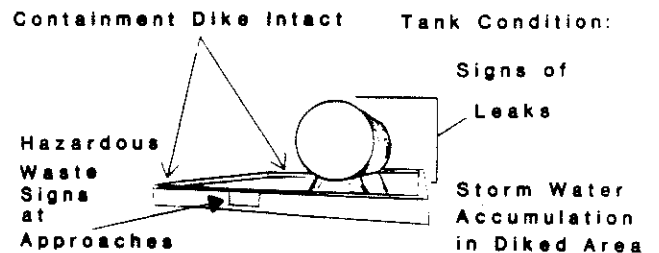
Gas Line Drip Water Tank
XX Bldg North



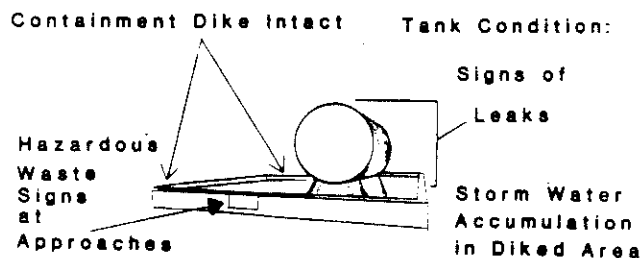
Gas Line Drip Water Tank
EE Bldg N.E. Corner



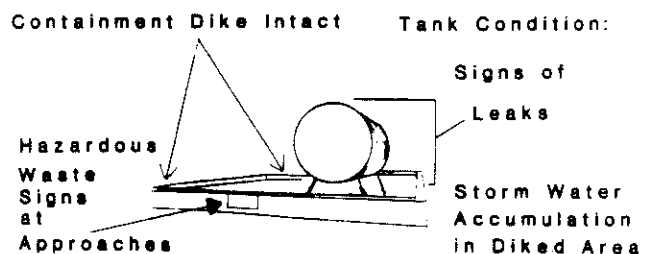
Gas Line Drip Water Tank
XX Bldg South



Gas Line Drip Water Tank
West Head House



Gas Line Drip Water Tank
Coal & Coke Lab



Gas Line Drip Water Tank
Gas Holder

Hazardous Waste
Inspection
Week Of: - -

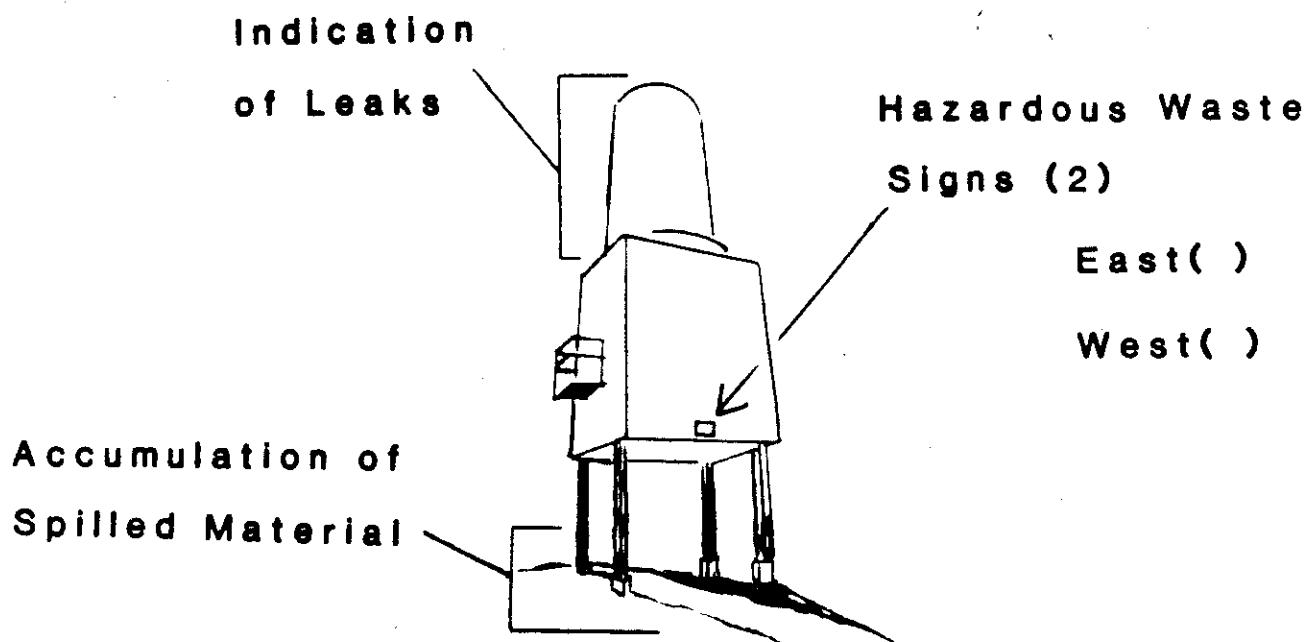
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Dept *

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Silo Condition:



**Electric Arc Furnace
Baghouse Dust Silo**

Hazardous Waste
Inspection

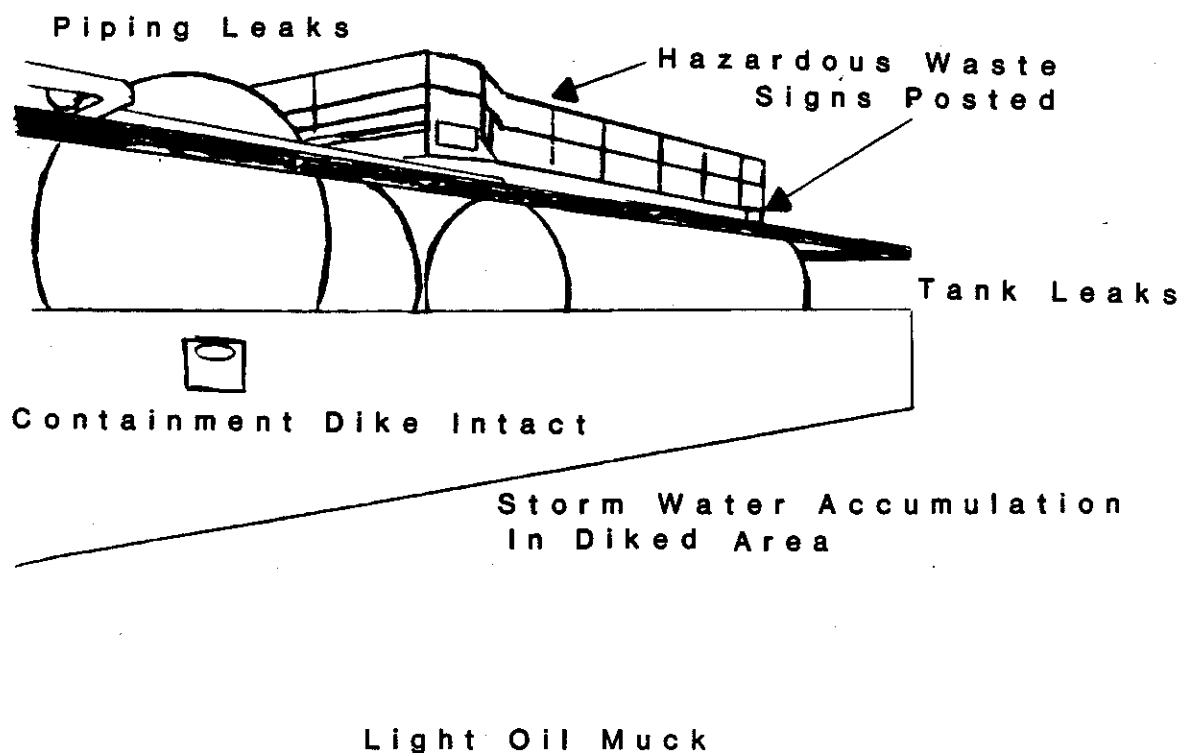
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Hot Strip Mill

Hazardous Waste
Inspection

Week Of: - -

Name:

Date:

Dept #

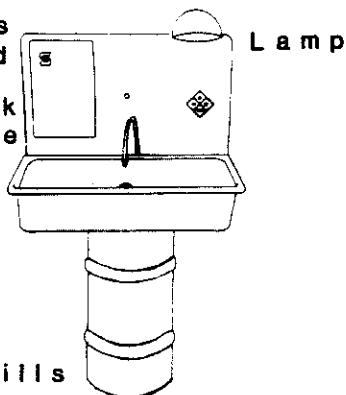
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Fusible Link
In Place

Hose/
Fittings OK

Signs Of
Leaks/Spills



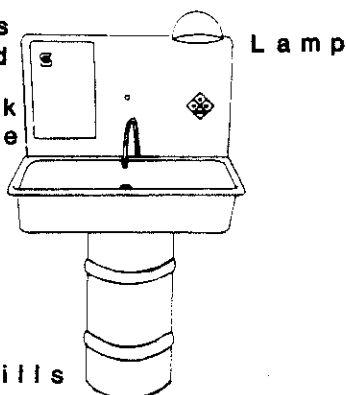
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Hose/
Fittings OK

Signs Of
Leaks/Spills



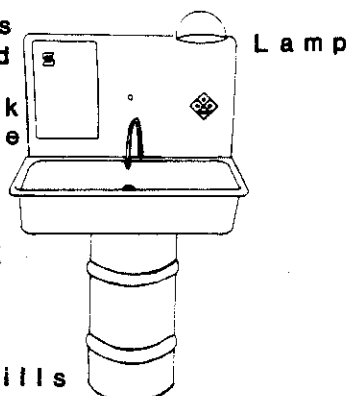
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Hose/
Fittings OK

Signs Of
Leaks/Spills



H 7 8

Name:

Date:

Dept #

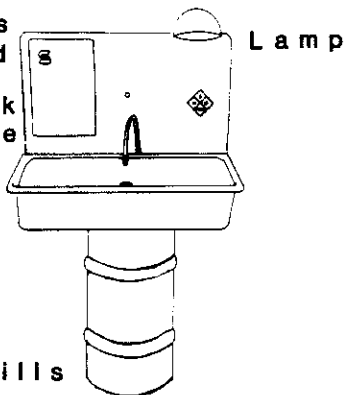
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Hose/
Fittings OK

Signs Of
Leaks/Spills



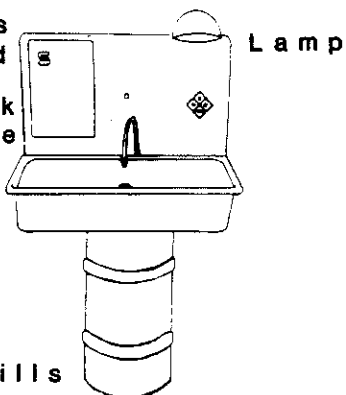
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Instructions
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Fusible Link
In Place

Hose/
Fittings OK

Signs Of
Leaks/Spills



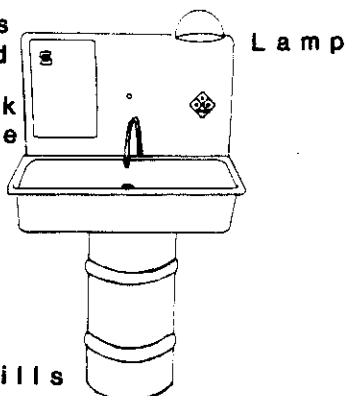
OH41N

Instructions
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Fusible Link
In Place

Hose/
Fittings OK

Signs Of
Leaks/Spills



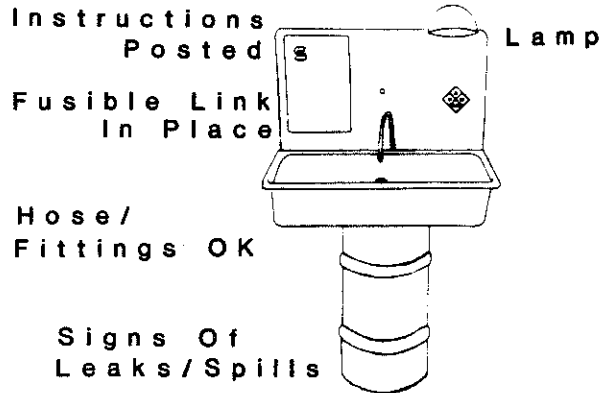
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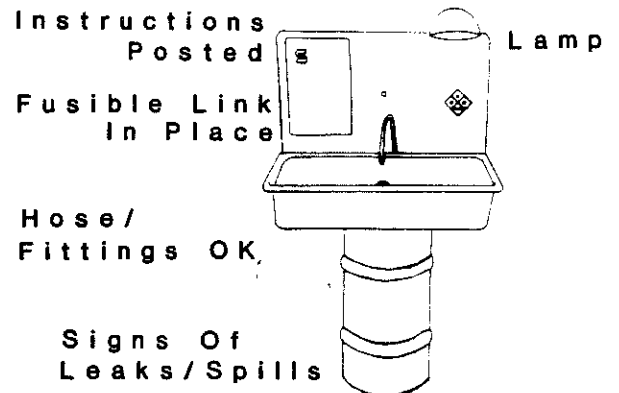
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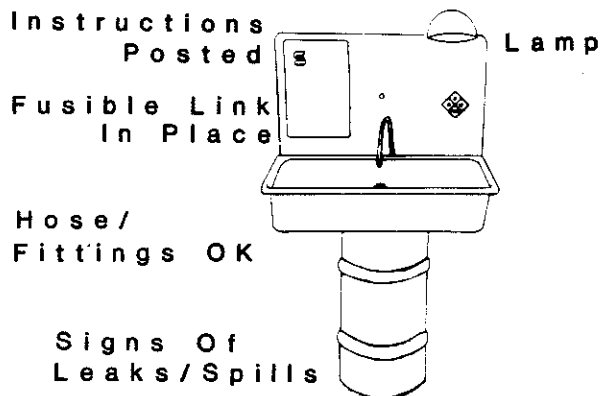
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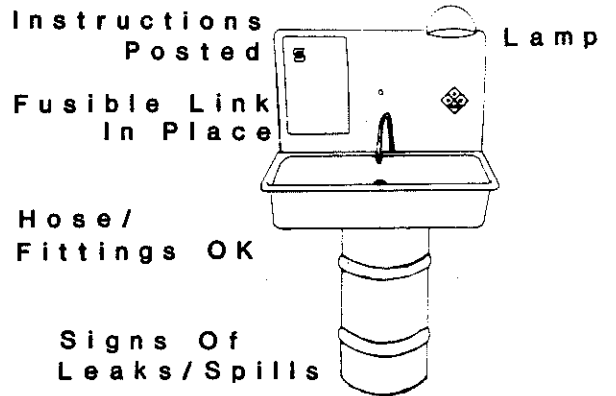
Instrument Shop



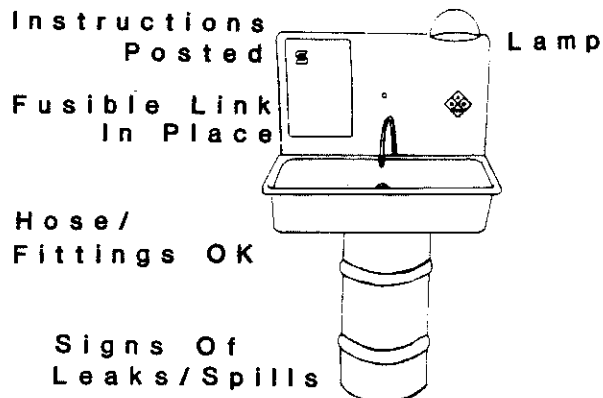
D14S



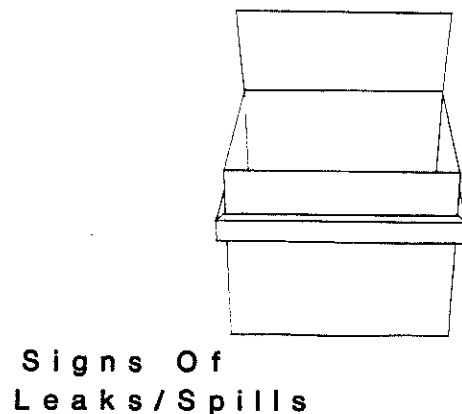
H17 Electrical Repair



J-9 Paint shop ROW



H19 Crane Repair



Hazardous Waste
Inspection

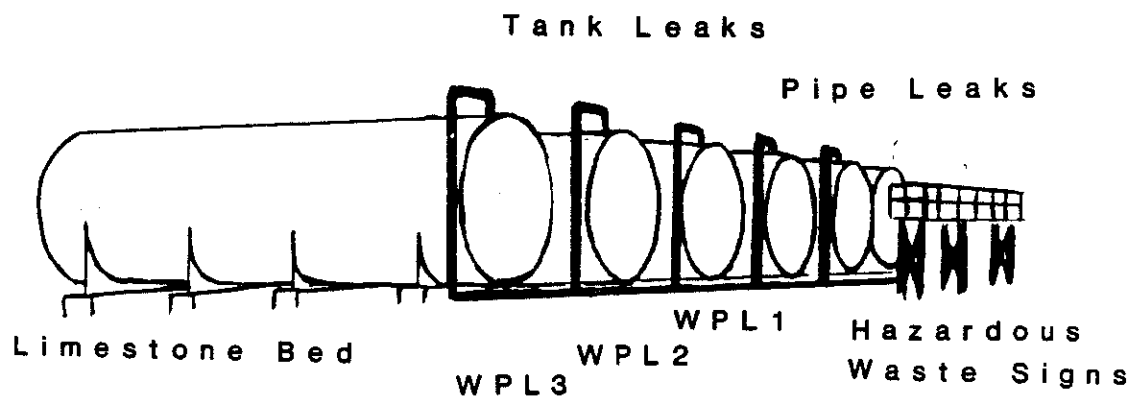
Week Of: - -

Name:

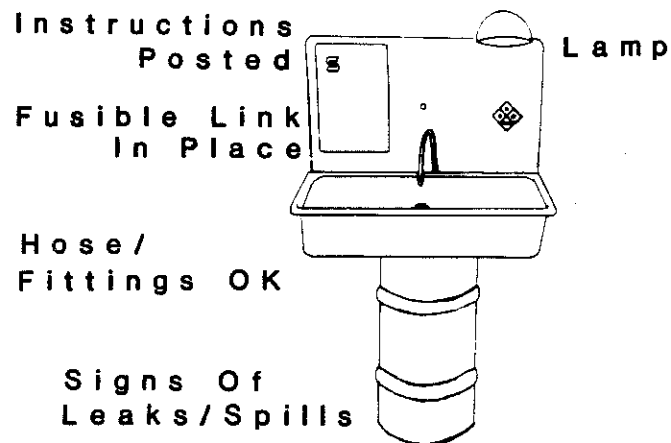
Date:

Dept #

11-9.5d



Waste Pickle Liquor Tanks



Y72

Truck Garage

Hazardous Waste

Storage Pad

Hazardous Waste

Inspection

Week Of: - -

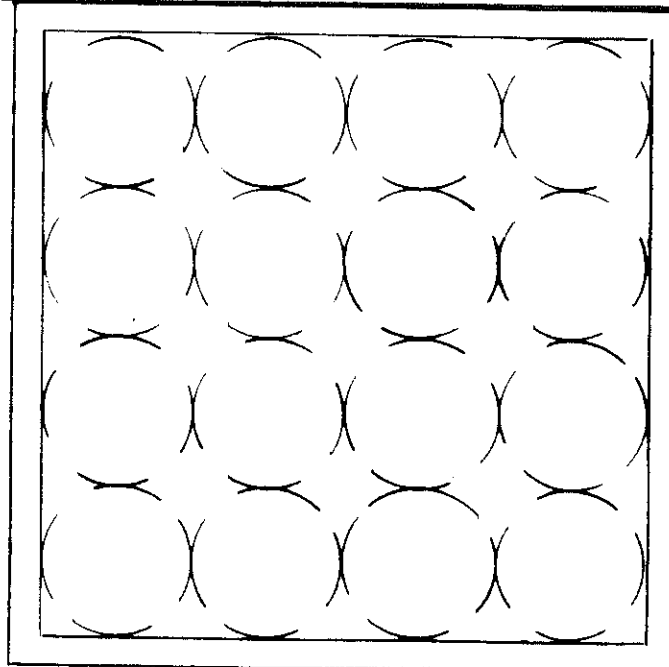
Name:

Date:

Dept #

11-9.5d

SUB 15



Containment
Dike Intact

Drums:

Label

Date

DOT Name

(fill in info for
each drum on pad)

Storm Water Accumulation In Diked Area

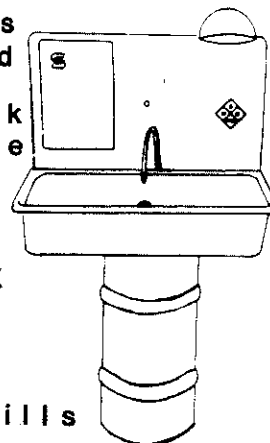
Power House Number 1

Instructions
Posted

Fusible Link
In Place

Hose/
Fittings OK

Signs Of
Leaks/Spills



Lamp

4th Floor Machine Shop